Issuance Date: October 6, 2004 Effective Date: November 1, 2004 Expiration Date: November 1, 2009

## **AIR OPERATING PERMIT 000054-0**

In compliance with the provisions of The State of Washington Clean Air Act Chapter 70.94 Revised Code of Washington

### Goldendale Aluminum Company 85 John Day Dam Road Goldendale, Washington 98620-9302

is authorized to operate in accordance with the terms and conditions of this permit.

Issued by:

State of Washington **DEPARTMENT OF ECOLOGY** 

300 Desmond Drive P.O. Box 47600 Olympia, Washington 98504-7600

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#### SECTION I: INTRODUCTION AND LEGAL AUTHORITY

This Air Operating Permit is issued under the procedures established in the Operating Permit Regulation, Chapter 173-401 WAC (Washington Administrative Code). The provisions of this permit describe the emissions limitations, operating requirements, emission monitoring, recordkeeping requirements, and reporting frequencies for the permitted source.

Goldendale Aluminum Company (GAC) requires a Chapter 173-401 WAC Air Operating Permit because GAC emits or has the potential-to-emit, one hundred tons per year or more of one or more air pollutants as evidenced by GAC's annual emission inventories and GAC's monthly air emission reports. [WAC 173-401-300(1)]

Terms used in this permit have the meaning assigned to them in the referenced regulations. The definitions of terms contained in WAC 173-401-200, and as defined in all referenced regulations, apply to this permit unless otherwise defined in the permit.

All terms and conditions except state-only requirements are enforceable under the Federal Clean Air Act (FCAA). State-only requirements are specifically identified in the permit.

#### SECTION II: SPECIFIC TERMS AND CONDITIONS OF THE PERMIT

The permittee is subject to the respective requirements in each of the tables for the specific processes (Table B-E) plus all the facility-wide generally applicable requirements (Table A). Insignificant emission units (IEUs) and activities are subject to the applicable requirements contained in the facility—wide generally applicable requirements (Table A), however, they are not subject to testing, monitoring, recordkeeping, reporting and certification requirements unless the generally applicable requirements in the State Implementation Plan (SIP) impose them. [WAC 173-401-530(2)(c)]

During periods of temporary curtailment of smelting operations, the permittee may petition the Department in writing to reduce or eliminate both emission and ambient monitoring requirements. Curtailment is defined as 10 percent or less pots in smelting operation. During periods of total facility curtailment (100% of smelting operations are shut down), monitoring, inspections, and recordkeeping requirements can be discontinued if the permittee makes a contemporaneous record in a log or file maintained on site of the date and time of total facility curtailment. The permittee must provide a written notice to Ecology of the date and time of total curtailment with the subsequent monthly report. Reporting requirements shall remain in effect. Upon start-up of the curtailed smelting operations, all requirements in this permit shall come back into effect.

#### Facility-wide Generally Applicable Requirements:

The applicable requirements, test methods, and associated monitoring, recordkeeping and reporting requirements in the "Facility-wide Generally Applicable Requirements," Table A apply facility-wide, in addition to a more restrictive condition(s) contained in Tables B-E.

#### Process Specific Applicable Requirements:

The emission units identified in these tables (Table B to Table E) are the emission units that are subject to specific requirements in addition to the generally applicable requirements.

In column 5 (Basis of Authority), when more than one citation is listed for a permit condition and one is more stringent than or more specific than the other(s) or takes precedence, the more stringent, specific, or preceding citation is listed first. Less stringent or less specific citations are listed below the higher order requirement (typed in italicized font). [WAC 173-301-600].

A. Facility	-Wide Gene	rally Applicable Requirements		
Condition No.	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
A.1	Visible Emissions (VE)	Must not exceed an average of 20% opacity for more than six consecutive minutes in any 60-minute period.	The permittee shall conduct EPA Method 9 (40CFR Part 60, Appendix A) upon request by Ecology.  If visible emissions are observed at stack(s) at any time, the observation shall be documented and corrective action initiated as soon as practical but not to exceed 24 hours after the observation.  The permittee shall conduct a weekly functional integrity inspection of each emission unit and its air emission device. The minimum requirement of the inspection for an air emission device (such as baghouse) and its emission unit will include a visual/sensory check of the following parameters: visible emissions (no Method 9 test required), leaks in/out of any ductwork or housing, pressure drops, and excess vibration/noise. The permittee shall initiate corrective action as soon as practical but not to exceed 24 hours if problems are observed during the inspection. The inspection log and	WAC 173-415-030(3) [approved into the SIP on 2/19/91; state rule effective 3/22/91]  Order No. 1169-AQ04, Condition A.1  WAC173-415-030  [WAC 173-401-615(1)(b) & WAC 173-401-630(1)]
			any resulting corrective action(s) shall properly maintained for review.  [WAC 173-401-615(1)(b) & -605(1)]	
A.2	Ambient Air HF	Monitor daily during growing season at stations G and H	The permittee shall conduct daily monitoring for HF in ambient air during the growing season from March 1 through October 31. Use method ASTM D 3268 or an Ecology approved alternate. Report 24-hour average concentrations in ug/m3 in the monthly air emissions report.	Order No. 1169-AQ04, Condition A.2 State-only Requirement

Condition No.	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
A.3	F (fluoride ion) in forage	Monitor monthly during growing season at station G, and Maryhill Land Co. or Takahashi. See notes 1 and 2  NOTE 1: GAC shall make every reasonable effort to collect representative's samples. However, vegetative samples may not always be available throughout the growing season. Specified forage monitoring is not required if samples are not available. GAC shall explain the reasons, in the following monthly air emissions report, for any missed sampling.  NOTE 2: GAC shall sample forage, when available, from at least one location east and west of the facility. The forage sample from west of the plant may be from either the Takahashi or Maryhill site. The results from all sampling will also be reported in the following monthly air emission report.	The permittee shall conduct monthly forage sampling and analysis during the growing season from March 1 through October 31, using ASTM D 3270 or Ecology approved alternate.  Report as ppm F <sup>-</sup> (fluoride ion) on a dried weight basis in the monthly air emissions report.	Order No. 1169-AQ04, Condition A.: State-only Requiremen

Condition No.	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
A.4	Fluoride emissions	Sampling must be conducted in locations and during time periods consistent with	The permittee shall comply with Conditions No. A.2 and A.3.	WAC 173-481 110
		protecting livestock and vegetation. Gaseous fluorides in the ambient air calculated as HF must not exceed:  - 3.7 ug/m³ for any 12 consecutive hours; - 2.9 ug/m³ for any 24 consecutive hours; - 1.7 ug/m³ for any 7 consecutive days; - 0.84 ug/m³ for any 30 consecutive days; - 0.50 ug/m³ average for period from March 1 through	The permittee shall monitor for compliance with 24-hour standard. Ecology will deem compliance with the 24-hour standard is deemed compliance with the 12-hour standard.	Order No. 1169-AQ04, Condition A.4 State-only Requirement

A. Facility Condition No.	<b>/-Wide Gene</b> Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
A.5	Operation and maintenan ce (O & M) Consistent with Good Air Pollution Control Practices	At all times, including periods of abnormal operation and upset, Goldendale Aluminum shall, to the extent practicable, maintain the facility, and operate and maintain air pollution control equipment in a manner consistent with good air pollution control practice.  Ecology's determination of whether the permittee uses acceptable O&M procedures are being used will be based on information available to Ecology that may include, but is not limited to, monitoring results, opacity observations, inspections of the source, and content of the O&M manuals.  Emissions that result from the permittee's failure to follow the requirements of the manuals may be considered proof that the equipment was not properly operated and maintained.	The permittee shall maintain training records. [WAC 173-401-615(1)(b) & WAC 173-401-630(1)]  Copies of the permittee's O&M manuals must be available to Ecology inspector's review.	WAC 173-415-030(6) [3/22/91; approved into the SIP on 2/19/91] Order No. 1169-AQ04, Condition A.5

A. Facility	A. Facility-Wide Generally Applicable Requirements					
Condition No.	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
A.6	Fallout	No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the permittee in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.	The permittee shall conduct investigations of any reports of excessive fallout and maintain records of: (1) each report of fallout by operational staff or complaint of excessive fallout received; (2) the results of the investigation into the validity and/or cause of the excessive fallout; (3) corrective action taken, if any, to eliminate the excessive fallout; and (4) the time the action was initiated and completed. The permittee shall initiate corrective action within 24 hours of complaint when any valid complaint is received.  [WAC 173-401-615(1)(b) & WAC 173-401-630(1)]	WAC 173-400- 040(2) [effective 3/22/91; not submitted for SIP approval] State-only requirement		
A.7	Fugitive Emissions	The permittee shall use RACT to prevent fugitive emissions.	The permittee shall comply with Condition No. A.1.  Minimum requirements for reasonable precautions to control fugitive emissions may include but are not limited to: using dust suppressant agents (water, lignosulfate, etc.); minimizing emissions from material transfer and conveyance systems; keeping building doors, vents, openings closed; in the paste plant ensure that the shrouds and hoods are in place, etc.	WAC 173-415- 030(4) [effective 3/22/91; approved into the SIP on 2/19/91]		
A.8	Fugitive Dust	The permittee shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions.	The permittee shall comply with Condition No. A.1.	WAC 173-400- 040(8)(a) [effective 3/22/91; approved into the SIP on 8/20/93]		

Condition	Parameter	rally Applicable Requirements  Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of
No.	1 didilictor	Description of Requirement	Morntoning, Reporting and Recordaceping	Authority
A.9	Odor	The permittee must use recognized good practice and procedures to reduce odors which may unreasonably interfere with any other property owner's use and enjoyment of his property to a reasonable minimum.  The permittee shall conduct investigations of any reports of odor and maintain records of: (1) each report of odor by operational staff or complaint of odors received; (2) the results of the investigation into the validity and/or cause of the odors; (3) corrective action taken, if any, to eliminate or reduce the odor; and (4) the time the action was initiated and completed. The permittee shall initiate corrective action within 24 hours of complaint when any valid complaint is received.  [WAC 173-401-615(1)(b) & WAC 173-401-630(1)]		WAC 173-400- 040(4) [3/22/91; not submitted for SIP approval] State-only Requirement
A.10	Emissions Detriment al to Persons or Property	The permittee shall not cause or permit the emissions of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business	The permittee shall conduct investigations of any reports of detrimental emissions and maintain records of: (1) each report of detrimental emissions by operational staff or complaint of detrimental emissions received; (2) the results of the investigation into the validity and/or cause of the detrimental emissions; (3) corrective action taken, if any, to eliminate or reduce the detrimental emissions; and (4) the time the action was initiated and completed. The permittee shall initiate corrective action within 24 hours of complaint when any valid complaint is received.  [WAC 173-401-615(1)(b) & WAC 173-401-630(1)]	WAC 173-400- 040(5) [3/22/91; approved into the SIP on 8/20/93]
A.11	Sulfur Dioxide – Mass Limit	Total emissions of sulfur dioxide from all emissions units shall not exceed sixty pounds of sulfur dioxide per ton of aluminum produced on a monthly average.	The permittee shall comply with Condition No. B.7.	WAC 173-415- 030(5)(a) [3/22/91; approved into the SIP on 2/19/91]

Condition No.	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
A.12	Sulfur Dioxide – Concentra tion Limit	The permittee shall not cause or permit the emissions of a gas containing sulfur dioxide in excess of 1,000 ppm corrected to dry standard conditions for an hourly average.	The permittee shall comply with Condition No. B.7.	WAC 173-415- 030(5)(b) [3/22/91; approved into the SIP on 2/19/91]
A.13	Particulate Material	Emissions of particulate material from any combustion and incineration unit and from any general process operations shall not exceed 0.1 grains/dscf.	The permittee shall conduct an emission test at Ecology's request. The reference test methods are EPA Test Method 5 or 17 (40 CFR Part 60, Appendix A); or another EPA approved method (40 CFR Part 63, Appendix A).  [WAC 173-401-615(1)(b) & WAC 173-401-630(1)]	WAC 173-400- 050(1) and WAC 173-400- 060 [effective 3/22/91; approved into the SIP on 8/20/93]

A. Facility-Wide Generally Applicable Requirements							
Condition No.	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority			
A.14	Corrective Active	A standard procedure shall be followed when initiating corrective action	A standard procedure shall be developed by the permittee for how corrective actions are to be taken.	WAC 173-401- 630			

B. Potroom Oper	ations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
B.1	Particulate Matter	Monthly average emissions, and running 12-month average emissions	The permittee shall comply with the monitoring, reporting and	PSD X-88-01, Amendment 2,
Combined emissions from dry scrubbers and roof wet scrubbers	(including PM10)	shall not exceed 8.0 lb/ton aluminum produced, and 6.0 lb/ ton aluminum produced, respectively.	recordkeeping requirements in Condition No. B.24.	Conditions 1.a.i and 1.a.ii.
B.2  Combined emissions from dry scrubbers and roof wet scrubbers	Particulate Matter (including PM10)	Mass emission rates shall not exceed 3,432 lb/day & 555 tons/year,	The permittee shall comply with Condition No. B.24.	PSD X-88-01, Amendment 2, Condition 1.a.iii.
B.3	Total Fluorides (TF)	Monthly average emissions and running 12-month average emissions	The permittee shall comply with Condition No. B.24.	PSD X-88-01, Amendment 2,
Plant-wide		shall not exceed 2.0 lb/ton aluminum produced and 1.6 lb/ ton aluminum produced, respectively.		Conditions 1.b.i and 1.b.ii.
B.4 Plant-wide	Total Fluorides (TF)	Mass emission rates shall not exceed 1,010 lb/day and 148 tons/year.	The permittee shall comply with Condition No. B.24.	PSD X-88-01, Amendment 2, Condition 1.b.iii.
B.5	Carbon Monoxide	Monthly average emissions shall not exceed 366 lb/ton aluminum	The permittee shall comply with Condition No. B.24.	PSD X-88-01, Amendment 2,
Plant-wide	(CO)	produced.		Condition 1.c.i
B.6	Carbon Monoxide	Mass emission rates shall not exceed 187,000 lb/day.	The permittee shall comply with Condition No. B.24.	PSD X-88-01, Amendment 2,
Plant-wide	(CO)			Condition 1.c.ii.

B. Potroom Oper	rations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
B.7 Plant-wide	Sulfur Dioxide (SO2)	Running 12-month average emissions shall not exceed 4.14 (%S) or 14.0 lb/ton of aluminum produced (where %S is the % of sulfur by weight in the coke used to make the anode mix).	The permittee shall comply with Condition No. B.24.	PSD X-88-01, Amendment 2, Condition 1.d.i.
B.8 Plant-wide	Sulfur Dioxide (SO2)	Mass emission rates shall not exceed 2,097 (%S) + 786 or 7,077 lb/day (where %S is the % of sulfur by weight in the coke used to make the anode mix).	The permittee shall comply with Condition No. B.24.	PSD X-88-01, Amendment 2, Condition 1.d.ii.
B.9  Cell line or cell section Startup and Shutdown	Definition of Startup definition and duration, and Shutdown definition	The first day of startup is the day the first cell in an existing or a new cell line is energized, or the day the first cell in a cell line section is energized when only a cell line section(s) is being energized.  Startup ends 180 days after the day the first cell has been energized when a whole cell line is being restarted.  Startup ends 120 days after the first cell in a cell line section has been energized when a cell line section(s) is being restarted, or the date the last cell energized in the energized cell line section(s) has attained stable operation per the Startup, Shutdown,		PSD X-88-01, Amendment 2, Conditions 2.a, 2.b, and 2.g.

Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
Emission Unit			Recordkeeping	Authority
		and Malfunction Manual (SSM Plan - Condition No. B12).		
		Shutdown is defined when the cell line or cell line section has been deenergized and the cryolite bath has solidified.		
B.10	Startup mass emissions	During Startup, the emissions in lb/ton of aluminum from a cell line are		PSD X-88-01, Amendment 2,
Cell line or cell section Startup	excluded	excluded in determining compliance with limitations in Conditions No. B.1, B.3, B.5, and B.7.		Condition 2.c.
B.11	Startup mass emissions	During Startup, the emissions in pounds per day and tons per year		PSD X-88-01, Amendment 2,
Cell line or cell section Startup	included	from a cell line are required to be included in determining compliance with the limitations in Conditions No. B.2, B.4, B.6, and B.8.		Condition 2.d.
B.12	Startup, Shutdown	During startup, the SSM Plan developed to comply with 40 CFR	The permittee shall comply with the Goldendale Aluminum Company SSM	PSD X-88-01, Amendment 2,
Cell line or cell	and	Part 63, Subparts A and LL, shall be	Plan, dated August 2002, submitted to	Condition 2.e.
section Startup	Malfunction Plan (SSM Plan)	followed.	Ecology and EPA Region 10 on August 28, 2002, or a later SSM Plan revision submitted to Ecology and EPA.	

B. Potroom Oper	B. Potroom Operations					
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of		
Emission Unit			Recordkeeping	Authority		
B.13	Startup	A cell line or cell line section(s) during	The permittee shall comply with	PSD X-88-01,		
	monitoring	Startup shall follow the monitoring and	Condition No. B.17.	Amendment 2,		
Cell line or cell	and work	work practices criteria in Condition		Condition 2.f.		
section Startup	practices	No. B.17.				
B.14	Excess	The permittee shall notify the	The permittee shall report to Ecology	PSD X-88-01,		
	emission	Washington Department of Ecology of	as soon as possible excess emissions	Amendment 2,		
Plant-wide	reporting	any occurrence of any emissions in excess of limits in Conditions No. B.1	which represent a potential threat to human health or safety or which the	Condition 3.		
		through B.8; such notification shall be	owner or operator of the source	[WAC 173-400-		
		submitted to Ecology as required by	believes to be unavoidable. The	107(3)]		
		WAC 173-400-107. The permittee	permittee shall report other excess	/ /2		
		shall contemporaneously send a copy	emissions within thirty days after the			
		of all such notifications to EPA.	end of the month during which the			
			event occurred or as part of the			
			routine emission monitoring report.			
B.15	Emission	Testing for compliance with the	The permittee shall comply with	PSD X-88-01,		
	testing -	emission limitations shall be	Condition No. B.24.	Amendment 2,		
Plant-wide	normal	conducted using testing and sampling		Condition 4.a.i.		
	operation	methods approved by the Ecology or EPA. The testing and sampling				
		procedures shall be representative of				
		the entire plant operation. The testing				
		frequency for the secondary system				
		shall be at least four fans per line per				
		month (two fans each in two different				
		sections) tested at four points per fan.				
		The pounds per day emission rate				
		shall be calculated by multiplying the				

B. Potroom Ope	rations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		monthly average emission rate in units of pounds per ton of aluminum produced by the actual daily aluminum production rate.		
B.16	Emission testing -	These emission testing conditions apply while a cell line or cell line	The permittee shall comply with Condition No. B.24.	PSD X-88-01, Amendment 2,
Plant-wide	Startup operations	section(s) are in startup mode per Condition No. B.9. Testing for compliance with the emission limitations shall be conducted using testing and sampling methods approved by the Ecology or EPA. The testing and sampling procedures shall be representative of the startup emissions actually occurring. The secondary control system emissions testing shall consist of testing two fans per month per cell line covering the section(s) in startup mode. There shall be at least four sample points per fan. As a cell line section ends startup mode and enters normal operations, the secondary control system emissions testing for that cell line section shall conform to the testing program described in Condition No. B.15.		Condition 4.a.ii.

B. Potroom Oper	rations			
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
Emission Unit			Recordkeeping	Authority
B.17	Compliance	The permittee shall conduct and	These inspections shall be conducted	PSD X-88-01,
	monitoring	record results of inspections of ore	at least once per week. The	Amendment 2,
Plant-wide	and work	coverage on the reduction cells,	inspection records shall be maintained	Conditions 4.b.i
	practices	collector skirt condition, burner	for inspection and shall be supplied to	and 4.b.ii.
		condition, burner vacuum, and any	Ecology or EPA upon request.	
		other pertinent information relative to	T	
		gas and fume collection at each cell,	The permittee shall conduct annual	
		as may be agreed between Ecology and Goldendale Aluminum. The	environmental awareness training to cell line employees. The training	
		inspection personnel shall be	records shall be maintained for	
		organizationally independent of the	inspection and shall be supplied to	
		department responsible for	Ecology or EPA upon request.	
		operations.	Leology of El 71 apoli request.	
		operations.		
		The permittee shall implement and		
		enforce work practices to maximize		
		the capture of cell off-gases by the		
		primary collection and control system		
		and minimize emissions to the		
		secondary collection system.		
B.18	Startup,	The permittee will follow the		PSD Permit No.
	Shutdown,	recordkeeping and reporting		PSD X-88-01,
Plant-wide	and	requirements in the SSM Plan as		Amendment 2,
	Malfunction	required by 40 CFR 63.10(b)(2) and		Condition 4.c.
	(SSM) Plan	40 CFR 63.850(c)(2). The SSM Plan		
	Recordkeepin	shall be updated as necessary to		
	g, Monitoring	incorporate revised work practices		
	and Reporting	and procedures. The Department of		
		Ecology shall be informed in writing		
		whenever the SSM Plan is updated.		

B. Potroom Oper Condition No. &	Parameter	Description of Requirement	Monitoring Poporting and	Basis of
	Parameter	Description of Requirement	Monitoring, Reporting and	
Emission Unit			Recordkeeping	Authority
B.19	Shutdown	The emission testing, compliance		PSD Permit No.
	Cell Line	monitoring, and work practice		PSD X-88-01,
Plant-wide	Section(s)	requirements in Conditions No. B.15,		Amendment 2,
	and	B.16, and B.17 do not apply to a		Condition 4.d.
	Shutdown	shutdown cell line or cell line section.		
	Cell Line(s)	At the time a cell line or cell line		
	Emission	section is completely de-energized		
	Testing,	and the cryolite bath in all shutdown		
	Compliance	pots has solidified, the cell line section		
	Monitoring,	is considered to be shutdown.		
	and Work			
	Practices			
B.20	Startup and	The permittee shall notify Ecology	The permittee shall notify Ecology	PSD Permit No.
	Shutdown	which cell line(s) or cell line section(s)	which cell line(s) or cell line section(s)	PSD X-88-01,
Plant-wide	Notification	have been started up or shutdown	have been started up or shutdown	Amendment 2,
		during the month as part of the	during the month as part of the	Condition 5.
		monthly monitoring report. When a	monthly monitoring report. When a	
		cell line(s) or cell line section(s) will be	cell line(s) or cell line section(s) will be	
		started up, the permittee shall inform	started up, the permittee shall inform	
		Ecology, at least three (3) days prior	Ecology, at least three (3) days prior	
		to startup, how many sections or lines	to startup, how many sections or lines	
		will be restarted, and the anticipated	will be restarted, and the anticipated	
		date startup mode will end.	date startup mode will end.	
B.21	Permit	This permit amendment supercedes		PSD Permit No.
	Amendment	and cancels the original terms and		PSD X-88-01,
Plant-wide		conditions of the 1988 PSD permit		Amendment 2,
		(No. PSD X-88-01).		Condition 6.

B. Potroom Ope				I =
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
Emission Unit			Recordkeeping	Authority
B.22	Inconsistent	Any activity which is undertaken by		PSD Permit No.
	Activity	the permittee, or others, in a manner		PSD X-88-01,
Plant-wide		which is inconsistent with the		Amendment 2,
		application and this determination,		Condition 7.
		shall be subject to Ecology or EPA		
		enforcement under applicable		
		regulations. Nothing in this		
		determination shall be construed so		
		as to relieve the permittee of its		
		obligations under any state, local, or		
		federal laws or regulations.		
B.23	Agency	Access to the source by Ecology, or		PSD Permit No.
	Access	the U.S. Environmental Protection		PSD X-88-01,
Plant-wide		Agency (EPA), shall be permitted		Amendment 2,
		upon request for the purpose of		Condition 8.
		compliance assurance inspections.		
		Failure to allow access is grounds for		
		action under the Federal Clean Air Act		
		or the Washington Clean Air Act.		
B.24	Particulate	The total emission of particulate	The permittee shall conduct monthly	WAC 173-415-
		matter to the atmosphere from the	source tests of the primary system for	030(2)
Plant-wide		reduction process (potlines) shall be	particulates and fluorides for each cell	
		reduced to the lowest level consistent	line. The permittee also shall conduct	Order No.
[Combined		with reasonably available control	annual source tests for SO2 for each	1169-AQ04,
Emissions from		technology for primary aluminum	cell line. Stack emission tests shall be	Condition B.1
Line 1 & 2, and		plants. The emission of solid	conducted using EPA Reference	
Line 3 Primary		particulate shall not exceed fifteen	Methods or EPA approved methods.	PSD X-88-01
Exhaust		pounds per ton of aluminum produced	Each stack shall be sampled a	Amendment 2,
Systems (P3-1		on a daily basis.	minimum of three (3) times per month	Condition 4.a.
and P3-2) and			and include all operating shifts.	

B. Potroom Oper	B. Potroom Operations					
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of		
Emission Unit			Recordkeeping	Authority		
Line 1 & 2, and			The testing frequency for the			
Line 3			secondary system shall be at least			
Secondary			four (4) fans per line per month (two			
Exhaust			fans each in two different sections)			
Systems (P3-3			tested at four points per fan. The			
and P3-4)]			pounds per day emission rate shall be			
			calculated by multiplying the monthly			
			average emission rate in units of			
			pounds per tons of aluminum			
			produced by the actual daily			
			aluminum production rate.			
			Sampling particulates concurrent with			
			MACT compliance sampling may be			
			acceptable.			
			The permittee shall report results			
			monthly, and include all supporting			
			data from calculation and units and			
			dates tested on a summary sheet.			
			[WAC 173-401-615(1)(b) & WAC 173-			
			401-630(1)]			
			The permittee shall maintain data on			
			site for a minimum of five years for			
			agency review.			
B.25	MACT New	A permittee of an affected facility	The permittee, Goldendale Aluminum,	40 CFR		
	Source	(potroom group or anode bake	submitted notification on August 6,	63.840(c)		
Cell Line No. 3	Performance	furnace) under 40 CFR 60.190 of this	1999 to Ecology and the EPA Region	and		
	Standard	chapter may elect to comply with	10 of its intent to have line three	40 CFR		

B. Potroom Oper	ations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
[Line 3 Cell Line and Line 3 Primary & Secondary Air Pollution Control Systems (P3-2 and P3-4)]	(NSPS) Applicability	either the requirements of 40 CFR 63.845 of this subpart or the requirements of subpart S of part 60 of this chapter.	comply with the provisions of 63.845.	63.845(a) 40 CFR 60.190
B.26 Cell Line No. 3	MACT NSPS Lower TF emission limit	The permittee shall calculate a lower TF emission limit. Since 100% of cell line three production is subject to NSPS applicability, the permittee's calculated lower TF emission rate is 2.0 lb/ton of aluminum produced.		40 CFR 63.845(b)
B.27 Cell Line No. 3	MACT NSPS Upper TF emission limit	The permittee shall calculate an upper TF emission limit. Since 100% of cell line three production is subject to NSPS applicability, the permittee's calculated upper TF emission rate is 2.6 lb/ton of aluminum produced.		40 CFR 63.845(c)
B.28 Cell Line No. 3	MACT NSPS TF emission limitation	The permittee shall not discharge or cause to be discharged into the atmosphere emissions of TF from any potline associated with the modified potroom group, reconstructed potroom group, or new potroom group that exceed 2.0 lb/ton of aluminum produced, except that emissions less than 2.6 lb/ton of aluminum produced will be considered in compliance if the owner or operator demonstrates that	The permittee shall comply with the monitoring, reporting and recordkeeping requirements in Condition No. B.29.	40 CFR 63.845(e)

B. Potroom Oper				
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
Emission Unit			Recordkeeping	Authority
		exemplary operation and maintenance		
		procedures were used with respect to		
		the emission control system and that		
		proper control equipment was		
		operating at the potline during the		
		performance test.		
B.29	MACT NSPS	Within 30 days of any performance	Within 30 days of any performance	40 CFR
	Report	test that reveals emissions that fall	test that reveals emissions that fall	63.845(f)
Cell Line No. 3		between 2.0 and 2.6 lb TF/ton of	between 2.0 and 2.6 lb TF/ton of	
		aluminum produced, the permittee	aluminum produced, the permittee	
		shall submit to the applicable	shall submit to the applicable	
		regulatory authority a report indicating	regulatory authority a report indicating	
		whether all necessary control devices	whether all necessary control devices	
		were online and operating properly	were online and operating properly	
		during the performance test,	during the performance test,	
		describing the operating and	describing the operating and	
		maintenance procedures followed,	maintenance procedures followed,	
		and setting forth any explanation for	and setting forth any explanation for	
		the excess emissions.	the excess emissions.	
B.30	MACT NSPS	As an alternative to sampling as	The permittee shall comply with	40 CFR
	Procedures to	required in paragraphs (g)(1) and	Condition No. B.24.	63.845(g)(4)
Cell Line No. 3	determine TF	(g)(2) of this section, the permittee		
	emissions	may perform representative sampling		
		of the entire potline subject to the		
		approval of the applicable regulatory		
		authority. Such sampling shall		
		provide coverage by the sampling		
		equipment of both the new, modified,		
		or reconstructed potroom group and		
		the balance of the potline. The		

B. Potroom Oper Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
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B.31 Cell Line No. 3	MACT NSPS Opacity	coverage for the new, modified, or reconstructed potroom group must meet the criteria specified in the reference methods in 40 CFR 63.849. TF emissions shall be determined for the potline using the procedures, equations, and test methods in 40 CFR 63.847, 40 CFR 63.848, and 40 CFR 63.849. Compliance is demonstrated when TF emissions for the potline meet the requirements in 40 CFR 63.845(e).  The permittee shall not discharge or cause to be discharged into the atmosphere any emissions of gases that exhibit 10 percent opacity or greater.	The permittee shall conduct an emission test upon Ecology's request using reference test method EPA Test Method 9 (40 CFR Part 60, Appendix A, 7/1/03) or another EPA approved method.	40 CFR 63.845(h) WAC 173-415 030(3)
			If visible emissions are observed at any time, the observation shall be documented and corrective action initiated as soon as practical but not to exceed 24 hours.  The permittee shall comply with the MACT visible emission daily check, Condition B.41.	

B. Potroom Ope Condition No. &		Description of Descriptment	Monitoring Deporting and	Basis of
	Parameter	Description of Requirement	Monitoring, Reporting and	
Emission Unit	TE 1 : 14 1	T	Recordkeeping	Authority
B.32	TF Limits and	The permittee may average total	The permittee shall comply with	40 CFR
	Total Fluoride	fluoride emissions from potlines.	Condition No. B.33.	63.846(b)
Plant-wide	Emission	Emissions of total fluoride to the		
	Averaging	atmosphere shall not exceed a		40 CFR
		monthly average of 2.0 lb/ton of		63.843(a)(1)(v)
		aluminum produced when operating		
		one or two VSS1 potlines; and not		
		exceed a monthly average of 1.9		
		lb/ton of aluminum produced when		
		operating three VSS1 potlines.		
B.33	TF Emissions	Using the procedures in 40 CFR	The permittee shall compute and	40 CFR
	Monitoring	63.847 and in the approved test plan,	record the monthly average from at	63.848(a)
		the permittee shall monitor emissions	least three runs for secondary	
		of TF from each potline by conducting	emissions and the previous 12-month	and
		monthly performance tests.	average of all runs for the primary	
			control system to determine	40 CFR 63.847
			compliance with the applicable	
			emission limit. The permittee must	
			include all valid runs in the monthly	
			average. The duration of each run for	
			secondary emissions must represent	
			a complete operating cycle.	
B.34	POM Limits	Emissions of POM to the atmosphere	The permittee shall comply with	40 CFR
		shall not exceed a quarterly (3-month)	Condition No. B.35.	63.843(a)(2)(ii)
		average of 2.4 lb/ton of aluminum		
		produced for each potline.		
B.35	POM	Using the procedures in 40 CFR	The permittee shall compute and	40 CFR
	Emissions	63.847 and in the approved test plan,	record the quarterly (3-month)	63.848(b)
	Monitoring	the permittee shall monitor emissions	average from at least one run per	
		of POM from each Soderberg (VSS1)	month for secondary emissions and	

B. Potroom Oper Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
Emission Unit	- diamotor	2000 paori di reguirement	Recordkeeping	Authority
ZIIIISSIOII OIIIC		potline every three months.	the previous 12-month average of all runs for the primary control systems to determine compliance with the applicable emission limit. The permittee must include all valid runs in the quarterly (3-month) average. The duration of each run for secondary emissions must represent a complete operating cycle. The primary control system must be sampled over an 8-hour period, unless site-specific factors dictate an alternative sampling time subject to the approval of the regulatory authority.	Additionty
B.36	Test Plan	The permittee shall prepare a site-specific test plan prior to the initial performance test according to the requirements of 40 CFR 63.7(c). The test plan must include procedures for conducting the initial performance test and for subsequent performance tests required in 40 CFR 63.848 for emission monitoring. In addition to the information required by 40 CFR 63.7.	The test plan shall include:  Procedures to ensure a minimum of three runs are performed annually for the primary control system for each source.  For plants with roof scrubbers, procedures for rotating sampling among the scrubbers or other procedures to obtain representative samples as approved by the applicable regulatory authority.  For a VSS1 potline, procedures to ensure that one fan (or one scrubber)	40 CFR 63.847(b)(1), (5), (6), and (8) and 40 CFR 63.7(c) and 40 CFR 63.848

Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
Emission Unit		2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Recordkeeping	Authority
LITHOSIOTI OTHE			per potline is sampled for each run.  Procedures for establishing the frequency of testing to ensure that at least one run is performed before the 15 <sup>th</sup> of the month, at least one run is performed after the 15 <sup>th</sup> of the month, and that there are at least 6 days between two of the runs during the month, or that secondary emissions are measured according to an alternate schedule satisfactory to the applicable regulatory authority.	Addioney
B.37	Initial performance test		Following approval of the site-specific test plan, the permittee shall conduct an initial performance test during the first month following the compliance date in accordance with Condition Nos. B.38 and B.39.	40 CFR 63.847 (a)
B.38	Performance Test Requirements for TF Emissions from Potlines	The permittee shall measure and record the emission rate of total fluoride (TF) exiting the outlet of the primary control system for each potline and the rate of secondary emissions exiting through the roof scrubbers.	The permittee shall comply with Conditions No. B.24 and B.36.	40 CFR 63.847(d)(1) and 40 CFR 63.848(a)

B. Potroom Oper	rations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
B.39	Performance Test Requirements for POM Emissions from Soderberg Potlines	The permittee shall measure and record the emission rate of POM exiting the outlet of the primary control system for each potline and the rate of secondary emissions exiting through the roof scrubbers.	The permittee shall comply with Conditions No. B.24 and B.36.	40 CFR 63.848(b) and 40 CFR 63.847(d)(2)
B.40	Monitoring Parameters  and  Parametric Monitoring for the Potlines Emission Control Devices	Determine the upper and/or lower operating limits, as appropriate, for each monitoring device for the emission control system from values recorded during each of the runs performed during the initial test and from historical data from previous performance tests conducted by MACT approved test methods.  Operate, calibrate, and maintain a continuous parameter monitoring system for the dry alumina scrubbers and the wet roof scrubbers.  East and West Dry Scrubber System:  Alumina feed rate greater or equal to six tons per hour; and fan amperage not less than 90% and not more than 115% of 70 amps averaged over a 24-	The permittee may re-determine the upper and lower operating limits, as appropriate, based on historical data or other information and submit an application to Ecology to change the applicable limit(s).  The permittee shall maintain data on site for a minimum of five years for agency review.	40 CFR 63.847(h) and 40 CFR 63.848(f)

B. Potroom Oper			1	
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		hour calendar day. The six tons per hour alumina feed rate is based on 170 operating cells. The permittee will lower alumina feed rate stoichiometrically at lower production levels, e.g., three tons per hour when operating 2-1/2 34-cell sections (85 cells).  North Dry Scrubber System:  Alumina feed rate greater or equal to six tons per hour; and fan amperage not less than 90% and not more than 115% of 95 amps averaged over a 24-hour calendar day. The six tons per hour alumina feed rate is based on 186 operating cells. The permittee will lower alumina feed rate stoichiometrically at lower production levels, e.g., 4.4 tons per hour when operating four 34-cell sections (136 cells).		
		Wet Roof Scrubbers:		
		The permittee shall inspect the water flow measuring device located on each potline roof scrubber system daily to ensure that the control device		

B. Potroom Oper	rations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		is operating correctly (water flow to the roof scrubbers is present) and record the results of each inspection.		
		The permittee may redetermine the upper and/or lower operating limits, as appropriate, based on historical data or other information and submit an application to Ecology to change the applicable limit(s).		
B.41	Visible Emissions	The permittee shall visually inspect the exhaust stack of the Line 1 & 2 primary scrubber system, the Line 3 primary scrubber system, and the Line 1, 2, and 3 wet roof scrubbers on a daily basis for evidence of any visible emissions indicating abnormal operation.	The permittee shall maintain data on site for a minimum of five years for agency review.	40 CFR 63.848(g)
B.42	Corrective Action	The permittee shall initiate the corrective action procedures identified in the startup, shutdown, and malfunction plan [Condition No. B.12] within one hour of identification of a problem:	Within one hour of identification of a problem, the permittee shall initiate the corrective action procedures identified in the startup, shutdown, and malfunction plan (Condition No. B.12).	40 CFR 63.848(h)
		(1) If a monitoring device for a primary control device measures an operating parameter outside the limit(s) established under Condition No. B.40	Maintain records of all instances of failure to initiate corrective action procedures within one hour or to take necessary corrective actions to	

B. Potroom Ope	rations			
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
Emission Unit			Recordkeeping	Authority
Limission omit		[40 CFR 63.847(h)]; or  (2) If visible emissions indicating abnormal operation are observed from the exhaust stack of a control device during a daily inspection [Condition No. B.40]; or  (3) If a problem is detected during the daily inspection of a wet roof scrubber for potline secondary emission control [Condition No. B.41].  Failure to initiate the corrective action procedures within one hour or to take the necessary corrective actions to remedy the problem is a violation.	remedy the problem.	Additionty
B.43	Exceedances	No operating parameter limit contained in Condition B.40 shall be exceeded more than six times in any semiannual period. No more than one exceedance shall be attributed to any given 24-hour period.	The permittee shall submit a semiannual summary report. The first and all subsequent summary reports shall include the dates of each exceedance outside the normal operating ranges and the magnitude of each exceedance. The report shall also identify exceedances of any given operating parameter seven or more times in any semiannual period.	40 CFR 63.848(i)
B.44	Weight of Aluminum	The permittee shall operate and maintain a monitoring device to determine the daily weight of aluminum produced.	The permittee shall record the daily weight of aluminum produced per potline.	40 CFR 63.848(j)

B. Potroom Ope				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
B.45	Accuracy and Calibration	The permittee shall submit recommended accuracy requirements for review and approval of all monitoring devices required by Conditions No. B.40 through B.43 [40 CFR 63.848]  The submittal must be certified by the permittee to meet the accuracy requirements and must be calibrated in accordance with manufacture's instructions.	The permittee shall submit recommended accuracy requirements for review and approval within 90 days of startup and when any changes are made to monitoring devices affecting their accuracy.	40 CFR 63.848(k)
B.46	Performance Test Reports	The permittee shall submit a summary of all subsequent performance tests to Ecology on an annual basis.	The permittee shall submit a summary of all performance tests annually.	40 CFR 63.850(b)
B.47	Startup, Shutdown and Malfunction Plan and	The permittee shall develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining	The permittee shall comply with the monitoring, reporting and recordkeeping requirements in Conditions No. B.12 and B.41.	40 CFR 63.850(c) and
	Reports	the source during periods of startup, shutdown and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the (MACT) standard.	The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, and malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3)(iv).	40 CFR 63.6(e)(3)
B.48	Excess Emissions	The permittee shall submit a report if measured emissions are in excess of	The permittee shall submit excess emissions reports in accordance with	40 CFR 63.850(d)

B. Potroom Oper	ations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
	Report	the applicable standard in accordance with 40 CFR 63.10(e)(3).	40 CFR 63.10(e)(3)(v) semiannually unless quarterly reports are required as a result of excess emissions.	
B.49	Recordkeepin g	The permittee shall maintain files of all information (including reports and notifications) required by 40 CFR 63.10(b) and 40 CFR 63.850(e)	The permittee shall maintain required files for five years.	40 CFR 63.850(e)
B.50	Performance Test Method Audit Samples	The permittee shall analyze performance audit (PA) samples during each performance test. The permittee shall request performance audit materials from Ecology 45 days prior to the test date.	The permittee shall analyze performance audit (PA) samples during each performance test. The permittee shall request performance audit materials from Ecology 45 days prior to the test date.	40 CFR 63.7(b)(4)(i)
B.51  Cell Line No. 1 & 2 Primary Air Pollution Control System - Dry alumina scrubbers & baghouses (P3-1)	Authorization to construct, install and operate the west and east dry alumina scrubbers & baghouses			Order No. 1169-AQ04
B.52  Cell Line No. 3 and Cell Line No. 3 Primary &	Authorization to construct, install and operate Cell Line No. 3			Order No. 1169-AQ04

B. Potroom Oper	ations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Secondary Air Pollution Control Systems (P3-2 and P3-4)				
B.53  Reuse the onsite booster rectifier	Authorization to construct, install and operate Cell Line No. 2 technology improvements , "Point Feed Project."	Future cell line use of the booster rectifier will require Ecology approval prior to that use.	The permittee shall contact Ecology and get Ecology approval prior to using the booster rectifier as part of cell line operation.  Ecology may need to conduct a new source review for potline air emissions increase caused by the reuse.	Order No. 1169-AQ04 Condition No. B2
B.54  Cell Line No. 1 & 2 South SO2 Scrubber (P3-1) and Cell Line No. 3 North SO2 Scrubber (P3-2)	SO2 Scrubber liquor parametric monitoring	South SO2 Scrubber:  Scrubber liquor recycle rate greater or equal to 2,450 gpm; pH greater or equal to 6.4; and specific gravity less than or equal to 1.105 averaged over a 24-hour calendar day.  North SO2 Scrubber:  Scrubber liquor recycle rate greater or equal to 1,410 gpm; pH greater or equal to 6.4; and specific gravity less than or equal to 1.105 averaged over a 24-hour calendar day.	The permittee shall maintain data on site for a minimum of five years for agency review.	Letter from Robert Poss, EPA to Joseph Byrne, Martin Marietta Aluminum, dated April 29, 1982.

B. Potroom Oper Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
	1 didifictor	Description of Requirement		
LIIIISSIOII OIIII			Recorakeeping	Authority
Emission Unit  B.55  Combined emissions from dry scrubber and roof vent monitors	Operation and maintenance Consistent with Good Air Pollution Control Practices	At all times, including periods of abnormal operation and upset, the permittee must operate and maintain air pollution control equipment in a manner consistent with good air pollution control practice.	The permittee shall develop a training plan that contains specific procedures to be followed for operating and maintaining the potlines in a manner consistent with good air pollution control practice. The purpose of the training program is to ensure that workers: (1) at all times operate and maintain the potlines, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions; and (2) are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of air pollutants.  The training plan, at a minimum, shall incorporate the following measures to employ good air pollution control practice:  -Minimize those emissions generated by work practices such as, but not	WAC 173-415- 030(6)

Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of
Emission Unit			Recordkeeping	Authority
			-Develop and implement a pot fume	
			collection and enclosure system repair	
			policy	
			-Ensure that the primary air control	
			system is in good repair and operating	
			properly, including operating the fans	
			at or near design capacity;	
			-Maintain an adequate draw on each	
			operating pot including repairing holes	
			in ductwork, etc. (WAC 173-401-	
			600(2) & - 605(1))	
			The permittee shall annually train all	
			potroom workers in this training	
			program. Maintain employee training	
			records for at least three years.	
			·	
			Personnel shall conduct weekly	
			functional integrity inspections of each	
			operating potroom that visually	
			checks, at a minimum, the	
			performance requirements listed in	
			the above paragraph.	
			On a monthly basis personnel shall	
			measure the drawing capacity of the	
			fans.	
			Initiate corrective action within 24	
			hours when any improper air pollution	

B. Potroom Oper	B. Potroom Operations					
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and	Basis of		
Emission Unit			Recordkeeping	Authority		
			control practice is observed. Maintain			
			records of each inspection, fan			
			capacity measurement and corrective	ļ		
			actions.			

C. Paste Plant O	C. Paste Plant Operations				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
C.1 HEAF Unit (P2- 1)	Particulate	Emissions of particulate material from any general process operation shall not exceed 0.1 grains/dscf of exhaust gas.	The permittee shall conduct an emission test once every five years using EPA Reference Method 5 (40 CFR Part 60, Appendix A), or another EPA approved method.	WAC 173-400- 060 [effective 3/22/91, approved into the SIP on 8/20/93]	
C.2 HEAF Unit	POM	Shall not exceed 0.011 lb POM/ton of paste produced.  The permittee shall operate and maintain equipment to capture and control POM emissions from the paste production plant.	The permittee shall conduct an emission test once a year using EPA Reference Method 315 (40 CFR Part 63, Appendix) or another EPA approved method.  The permittee shall comply with Condition No. C.4.	Order No. 1169- AQ04, Condition C.1 and 40 CFR 63.843(b)(3)	
C.3 HEAF Unit	Temperatur e	The HEAF exit temperature shall be in range of 75 and 93°F. It is monitored in the OPT022, factory floor control. The Hi (93°F) and Low (75°F) alarms will be displayed on the 4th floor control screen.	The permittee shall identify the cause and take corrective action when the Hi alarm is initiated. The permittee shall shut down the cooler air supply fan when the Low alarm is initiated. The permittee shall record the time and the date when the alarms are initiated and when corrective action is taken. The permittee also shall record the cause of the alarm and the action taken to correct it.	Order No. 1169- AQ04, Condition C.2	
C.4 HEAF Unit	HEAF Unit Daily Operation s Check	The permittee shall perform the Daily Operations Check and record the checklist which includes: Date, HEAF blower fan amperage, cabinet pressure, pressure drop across filter media, pressure drop across	Each day the Paste Plant is in operation, the permittee shall perform and record a Daily Operations Check of the HEAF Unit on a monthly recording sheet.  The permittee shall record the date, check and record the readings for the HEAF blower	Order No. 1169- AQ04, Condition C.3 and 40 CFR 63.848(f) and	

C. Paste Plant O				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		mist eliminator, and visual stack emissions.	fan amperage, cabinet pressure, pressure drop across media, and pressure drop across the mist eliminator, and describe any visual stack emissions (Note: the sun shall be behind the operator at the time of the observation) and the operator shall initial the recording sheet.	40 CFR 63.847(h)(2)
			Operating Ranges: HEAF Blower Fan Amperage: 90-110 amps Cabinet Pressure: 3.1 – 3.7 inches Pressure Drop across media: 25 – 33 inches of water Pressure drop across mist eliminator: less than 0.25 inches	
			The permittee shall contact maintenance when visual stack emissions occur, or when any parameter is out of its range.	
			If the HEAF Unit is not operating within the acceptable ranges/standards, or shuts down for any reason, the Paste Plant must be shut down until the problem is corrected.	
C.5 HEAF Unit	POM	Operate and maintain equipment to capture and control POM emissions from the paste production plant.	The permittee shall comply with C.6 (parametric monitoring ) and C.7 (daily inspection).	40 CFR 63.843(b)(3)

C. Paste Plant O	perations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
C.6 HEAF Unit	Parametri c Monitoring	Operate, calibrate and maintain a continuous parameter monitoring system for the paste plant emission control device.  The hourly average temperature in the high efficiency air filtration (HEAF) unit stack shall not exceed 93 F	At least once each day inspect the control device to ensure the control device is operating properly and record the results of each inspection.  Continuously monitor and record stack temperature.  Continuously monitor and record stack air flow.	40 CFR Part 63.843(b)(3) and 40 CFR Part 63.848(f) and 40 CFR Part 63.847(h)
		The permittee may re-determine the upper and/or lower operating limits, as appropriate, based on historical data or other information and submit an application to Ecology to change the applicable limits(s).	Continuously monitor and record pressure drop.	
C.7 HEAF Unit	Visible Emissions	Visually inspect the exhaust stack on the control device on a daily basis for evidence of any VE indicating abnormal operation.	The permittee shall visually inspect the control device on a daily basis for any visible emissions indicating abnormal operation.	40 CFR 63.848(g)
C.8 HEAF Unit	Corrective Action	If a monitoring device for a primary control device measures an operating parameter outside the limits established under Condition No. C.4 [40 CFR Part 63.847(h)], or if visible emissions	Within one hour of identification of a problem, the permittee shall initiate the corrective action procedures identified in the startup, shutdown and malfunction plan.	40 CFR 63.848(h)

C. Paste Plant O	C. Paste Plant Operations				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
		indicating abnormal operation are observed from the exhaust stack of a control device during a daily inspection, the permittee shall initiate corrective action procedures identified in the startup, shutdown and malfunction plan within one hour. Failure to initiate corrective action procedures within one hour or to take the necessary corrective actions to remedy the problem is a violation.			
C.9 HEAF Unit	Exceedanc es	No operating parameter limit established under Condition No. C.4 shall be exceeded more than six times in any semiannual period. No more than one exceedance shall be attributed to any given 24-hour period.	The permittee shall submit a semiannual summary report. The first and all subsequent summary reports shall include the dates of each excursion outside the normal operating ranges and the magnitude of each excursion. The report shall also identify exceedances of any given operating parameter six or more times in any semiannual period.	40 CFR 63.848(i)	
C.10 HEAF Unit	Accuracy and Calibration s	Submit recommended accuracy requirements for review and approval of all monitoring devices required by Conditions C.6 through C.9 [40 CFR Part 63.848].  The submittal must be certified	The permittee shall submit recommended accuracy requirements for review and approval within 90 days of startup and when any changes are made to monitoring devices affecting their accuracy.	40 CFR 63.848(k)	

Parameter	Description of Descriptions of		
	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
	by the permittee to meet the accuracy requirements and must be calibrated in accordance with manufacturer's instructions.		
Startup, Shutdown	The permittee shall develop and implement a written plan as	Within 90 days of permit issuance, develop a written plan that contains specific procedures	40 CFR 63.850(c)
& Malfunctio n Plan & Reports	described in 40 CFR Part 63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the (MACT) standard.	maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the MACT emission standards.  The purpose of the startup, shutdown, and malfunction plan is to ensure that the permittee: (1) at all times operate and maintain affected sources, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; and (2) are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants.  In addition to the information required in 40	and 40 CFR 63.6(e)(3)
3	Shutdown Malfunctio Plan &	accuracy requirements and must be calibrated in accordance with manufacturer's instructions.  Startup, Shutdown implement a written plan as described in 40 CFR Part 63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown and malfunction and a program of corrective action for malfunctioning process and control systems used to comply	accuracy requirements and must be calibrated in accordance with manufacturer's instructions.  The permittee shall develop and implement a written plan as described in 40 CFR Part operating the source and maintaining the source and maintaining the source during periods of startup, shutdown and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the (MACT) standard.  Within 90 days of permit issuance, develop a written plan that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the MACT emission standards.  The purpose of the startup, shutdown, and malfunction plan is to ensure that the permittee: (1) at all times operate and maintain affected sources, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; and (2) are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants.

C. Paste Plant Operations					
Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
		to be followed if a monitoring device measures an operating parameter outside the limits established in Condition No. C.6, or if visible emissions from an exhaust stack indicating abnormal operation of a control device are observed by the owner or operator during the daily inspection required in Condition No. C.7. (2)the permittee shall also keep records of each event as required by 40 CFR Part 63.10(b) and record and report if an action taken during startup, shutdown, and malfunction is not consistent with the procedures in the plan as described in 63.6(e)(3)(iv).  The permittee shall comply with the Goldendale Aluminum Company SSM Manual, dated August 2002, submitted to Ecology and EPA Region 10 on August 28, 2002, or a later SSM Manual revision.			
Excess Emission	The permittee shall submit an excess emissions report,	If excess emissions are measured, the permittee shall submit an Excess Emissions	40 CFR 63.850(d) and 40 CFR		
кероп	in 40 CFR 63.10(e)(3)(v), if measured emissions are in excess of the applicable standard.	Submit the reports semiannually unless quarterly reports are required as a result of excess emissions.	63.10(e)(3)		
Recordke eping	The permittee shall maintain files of all information (including	Retain records for at least 5 years following the date of each occurrence, measurement,	40 CFR 63.850(e) and 40 CFR 63.10(b)		
	Excess Emission Report	Excess Emission Report Report The permittee shall submit an excess emissions report, containing information specified in 40 CFR 63.10(e)(3)(v), if measured emissions are in excess of the applicable standard.  Recordke The permittee shall maintain	Parameter Description of Requirement Monitoring, Reporting and Recordkeeping  to be followed if a monitoring device measures an operating parameter outside the limits established in Condition No. C.6, or if visible emissions from an exhaust stack indicating abnormal operation of a control device are observed by the owner or operator during the daily inspection required in Condition No. C.7. (2)the permittee shall also keep records of each event as required by 40 CFR Part 63.10(b) and record and report if an action taken during startup, shutdown, and malfunction is not consistent with the procedures in the plan as described in 63.6(e)(3)(iv).  The permittee shall comply with the Goldendale Aluminum Company SSM Manual, dated August 2002, submitted to Ecology and EPA Region 10 on August 28, 2002, or a later SSM Manual revision.  If excess emissions are measured, the permittee shall submit an excess emissions report, containing information specified in 40 CFR 63.10(e)(3)(v), if measured emissions are in excess of the applicable standard.  Recordke The permittee shall maintain files of all information (including files of all information files of all information files of all information (including files of all information files of all information files of all information files of all information files of all in		

C. Paste Plant Operations					
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
Emission Unit					
		required by 40 CFR Part 63.10(b) and 40 CFR Part 63.850(e).	record. The most recent 2 years of records must be retained at the facility. Maintain records as required by 40 CFR Part 63.850(e)(4).		

D. Ancillary Oper	rations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
D.1  Coke/Pitch Railcar Unloader Baghouse (P5- 14a) (~5,000 acfm	Particulate	Shall not exceed 0.01 gr/dscf.	The permittee shall conduct an emission test upon Ecology's request using reference test method EPA Test Method 5 (40 CFR Part 60, Appendix A, 7/1/03), or another EPA approved method.  The permittee shall comply with Condition No. D.3 as the indicator of continuous compliance.	Order No. 1169- AQ04, Condition D.1
D.2 Coke/Pitch Railcar Unloader Baghouse	Visible Emissions	Opacity shall not exceed average 5% for more than six consecutive minutes in any 60-minute period.	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition D.2
D.3  Coke/Pitch Railcar Unloader Baghouse	Baghouse Functional Integrity	Inspection	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition D.3
D.4  Cathode Demolition Building Baghouse (P5- 21) (112,000 acfm)	Particulate	Shall not exceed 0.005 gr/dscf.	The permittee shall conduct an emission test once a year using reference test method EPA Test Method 5 (40 CFR Part 60, Appendix A), or another EPA approved method.  The permittee shall comply with Condition D.6 as the indicator of continuous compliance.	Order No. 1169- AQ04, Condition D.4

D. Ancillary Oper	D. Ancillary Operations				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
D.5  Cathode  Demolition  Building  Baghouse	Visible Emissions	Opacity shall not exceed 5% for more than six consecutive minutes in any 60-minute period.	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition D.5	
D.6  Cathode  Demolition  Building  Baghouse	Baghouse Functional Integrity	Inspection	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition D.6	
D.7  Cathode  Demolition  Building  Baghouse	Operating hours	The operation of each baghouse shall be limited to a maximum of 6,120 hours per year.	The permittee shall install an hour meter on each of the baghouse fans. Hours shall be logged monthly and reported annually.	Order No. 1169- AQ04, Condition D.7	
D.8  Briquette Silo #2 Baghouse (P5-4) (4,777 acfm)	Particulate	Shall not exceed 0.005 gr/dscf.	The permittee shall conduct an emission test upon Ecology's request using reference test method EPA Test Method 5 (40 CFR Part 60, Appendix A, 7/1/03), or another EPA approved method.  The permittee shall comply with Condition D.10 as the indicator of continuous compliance.	Order No. 1169- AQ04, Condition D.8	
D.9 Briquette Silo #2	Visible Emissions	Opacity shall not exceed 5% for more than six consecutive minutes in any 60-minute period.	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition D.9.	

D. Ancillary Oper	rations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Baghouse				
D.10 Briquette Silo #2 Baghouse	Baghouse Functional Integrity	Inspection	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition D.10
D.11  Alumina Silo #2 Baghouse (P5- 9a) (3,940 acfm)	Particulate	Shall not exceed 0.005 gr/dscf.	The permittee shall conduct an emission test upon Ecology's request using reference test method EPA Test Method 5 (40 CFR Part 60, Appendix A), or another EPA approved method.  The permittee shall comply with Condition D.13 as the indicator of continuous compliance.	Order No. 1169- AQ04, Condition D.11
D.12 Alumina Silo #2 Baghouse	Visible Emissions	Opacity shall not exceed 5% for more than six consecutive minutes in any 60-minute period.	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition D.12.
D.13 Alumina Silo #2 Baghouse	Baghouse Functional Integrity	Inspection	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition D.13

D. Ancillary Oper	D. Ancillary Operations				
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
Emission Unit					
D.14	Particulate	Emissions of particulate material	The permittee shall conduct an emission	WAC 173-400-060	
	Material	shall not exceed 0.1 gr/dscf.	test upon Ecology's request using reference	[effective 3/22/91,	
Briquette Silo #1			test method EPA Test Method 5 (40 CFR	approved into the	
Baghouse (P5-3)			Part 60, Appendix A), or another EPA	SIP on 8/20/93]	
(6,333 acfm)			approved method.		
			The permittee shall comply with Condition		
			No. A.1		
D.15	Visible	Opacity shall not exceed 20%	The permittee shall comply with Condition	WAC 173-415-	
	Emissions	for more than six minutes in any	No. A.1	030(3) [approved	
Briquette Silo #1		60-minute period.		into the SIP on	
Baghouse		·		2/19/91; state rule	
				effective 3/22/91]	

E. Casthouse Op	E. Casthouse Operations				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
E.1 Homogenizing Furnace No. 4 & 5	NO <sub>X</sub>	Shall not exceed 0.098 lb/MMBtu for each furnace.	The permittee shall conduct an emission test on each homogenizing furnace every five years using reference test method EPA Test Method 7E (40 CFR Part 60, Appendix A) or another EPA approved method.	Order No. 1169- AQ04, Condition E.1	
E.2 Homogenizing Furnace No. 4 & 5	Visible Emissions	Opacity shall not exceed 5% for more than six consecutive minutes in any 60-minute period.	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition E.2	
E.3  Homogenizing Furnace No. 4 & 5	Furnace Functional Integrity	Preventive maintenance (PM) schedule	The permittee shall follow the plant preventive maintenance schedule. The permittee shall collect PM records monthly and make available to Ecology and EPA upon request.	Order No. 1169- AQ04, Condition E.3	
E.4 Homogenizing Furnace No. 4 & 5	Fuel	The furnaces shall be fired by natural gas. Propane is the only backup fuel allowed.	The permittee shall collect monthly fuel usage records and make records available to Ecology and EPA upon request.	Order No. 1169- AQ04, Condition E.4	
E.5 Tilter Melter/Holder Furnace	NO <sub>X</sub>	Shall not exceed 0.077 lb/MMBtu.	The permittee shall conduct an emission test every two years using EPA Test Method 7E (40 CFR Part 60, Appendix A) or another EPA approved method.	Order No. 1169- AQ04, Condition E.5	
E.6 Tilter Melter/Holder	Visible Emissions	Opacity shall not exceed 5% for more than six consecutive minutes in any 60-minute period.	The permittee shall comply with Condition No. A.1.	Order No. 1169- AQ04, Condition E.6	

E. Casthouse Operations				
Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
Furnace Functional Integrity	Preventive maintenance (PM) schedule	The permittee shall follow the plant's preventive maintenance schedule. The permittee shall collect PM records monthly	Order No. 1169- AQ04, Condition E.7	
		and make available to Ecology and EPA		
Fuel	The furnace shall be fired by natural gas. Propane is the only backup fuel allowed.	The permittee shall collect monthly fuel usage records and make those records available to Ecology and EPA upon request.	Order No. 1169- AQ04, Condition E.8	
Emission Standards for Affected Sources and Emission Units	Secondary Aluminum Processing Unit - PM   For each secondary aluminum processing unit, the permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of PM in excess of: $L_{CPM} = \frac{\displaystyle\sum_{i=1}^{n} (L_{tiPM} \times T_{ti})}{\displaystyle\sum_{i=1}^{n} (T_{ti})}$	On and after the date of approval of the operation, maintenance and monitoring (OM&M) plan, the permittee must comply with the emission limits calculated using the equation for PM.  Use the following individual emission unit limits for calculating the PM emission limit for the SAPU:  The permittee must not exceed 0.40 kg of PM per Mg (0.80 lb of PM per ton) of feed/charge from a group 1 melting/holding furnace, that is not a furnace processing only clean charge; and  The permittee must not exceed 0.005	40 CFR Part 63.1505(k)(1); Part 63.1505(j)(2); Part 63.1505(j)(2) and (3); Part 63.1505(i)(6); and Part 63.1505(j)(5)	
	Furnace Functional Integrity  Fuel  Emission Standards for Affected Sources and Emission	Furnace Functional Integrity  Fuel  The furnace shall be fired by natural gas. Propane is the only backup fuel allowed.  Emission Standards for Affected Sources and Emission Units  Secondary Aluminum Processing Unit - PM  For each secondary aluminum processing unit, the permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of PM in excess of:		

E. Casthouse Op Condition No. &		Description of Descriptions	Monitoring Poporting and Popordicaning	Poois of Authority
Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		Where, L <sub>tiPM</sub> = The PM emission limit for individual emission unit i for a group 1 furnace or for an in-line fluxer; T <sub>ti</sub> = The feed/charge rate for individual emission unit i; and L <sub>cPM</sub> = The PM emission limit for the secondary aluminum processing unit.	ton) of feed/charge from an in-line fluxer (40 CFR Part 63.1505(j)(2)) except that these emission limits do not apply to an in-line fluxer that uses no reactive flux materials.  However, The permittee may determine the emission standards for a SAPU by applying the group 1 furnace limits on the basis of the aluminum production weight in each group 1 furnace, rather than on the basis of feed/charge (40 CFR Part 63.1505(i)(6)), and, the permittee may determine the emission standards for a SAPU by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge (40 CFR Part 63.1505(j)(5)).	
E.10 Cast house (MACT)	Emission Standards for Affected Sources and Emission Units	Secondary Aluminum Processing Unit - HCI  For each secondary aluminum processing unit, the permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24- hour rolling average emissions of HCI in excess of:	On and after the date of approval of the operation, maintenance and monitoring (OM&M) plan, the permittee must comply with the emission limits calculated using the equation for HCI.  Use the following individual emission unit limits for calculating the HCI emission limit for the SAPU:  The permittee must not exceed 0.20 kg of HCI per Mg (0.40 lb of HCI per ton) of feed/charge for a group 1 furnace (40 CFR Part 63.1505(i)(4));	40 CFR Part 63.1505(k)(2) Part 63.1505(j)(4); Part 63.1505(j)(1) and (3); Part 63.1505(j)(6); and Part 63.1505(j)(5)

Parameter	Description of Requirement $L_{\text{CHCI}} = \frac{\displaystyle\sum_{i=1}^{n} \left(L_{\text{tiHCI}} \times T_{\text{ti}}\right)}{\displaystyle\sum_{i=1}^{n} \left(T_{\text{ti}}\right)}$	Monitoring, Reporting and Recordkeeping  and  The permittee must not exceed 0.02 kg of HCl per Mg (0.04 lb of HCl per	Basis of Authority
	$L_{ ext{CHCI}} = rac{\displaystyle\sum_{i=1}^{n} \left(L_{ ext{tiHCI}}  imes T_{ ext{ti}} ight)}{\displaystyle\sum_{i=1}^{n} \left(T_{ ext{ti}} ight)}$	The permittee must not exceed 0.02 kg of HCl per Mg (0.04 lb of HCl per	
	Where, L <sub>tiHCI</sub> = The HCI emission limit for individual emission unit i for a group 1 furnace or for an in-line fluxer; and L <sub>cHCI</sub> = The HCI emission limit for the secondary aluminum processing unit.	ton) of feed/charge from an in-line fluxer (40 CFR Part 63.1505(j)(1)) except that these emission limits do not apply to an in-line fluxer that uses no reactive flux materials(40 CFR Part 63.1505(j)(3)).  However, The permittee may determine the emission standards for a SAPU by applying the group 1 furnace limits on the basis of the aluminum production weight in each group 1 furnace, rather than on the basis of feed/charge(40 CFR Part 63.1505(i)(6)), and, the permittee may determine the emission standards for a SAPU by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge.	
Emission Standards for Affected Sources and Emission	Processing Unit – Dioxins and Furans  For each secondary aluminum processing unit,	On and after the date of approval of the operation, maintenance and monitoring (OM&M) plan, the permittee must comply with the emission limits calculated using the equation for D/F.	40 CFR Part 63.1505(k)(3); Part 63.1505(i)(3); and Part 63.1505(i)(6)
St fo So ar Er	randards r Affected ources nd mission	for an in-line fluxer; and L <sub>cHCI</sub> = The HCI emission limit for the secondary aluminum processing unit.  Secondary Aluminum Processing Unit – Dioxins and Furans  and Furans  For each secondary aluminum processing unit,	for an in-line fluxer; and L <sub>cHCl</sub> = The HCl emission limit for the secondary aluminum processing unit.  However, The permittee may determine the emission standards for a SAPU by applying the group 1 furnace limits on the basis of the aluminum production weight in each group 1 furnace, rather than on the basis of feed/charge(40 CFR Part 63.1505(i)(6)), and, the permittee may determine the emission standards for a SAPU by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge.  On and after the date of approval of the operation, maintenance and monitoring (OM&M) plan, the permittee must comply with the emission limits calculated using the equation for D/F.

Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Emission Unit		i i		
		discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of D/F in excess of:	limits for calculating the D/F emission limit for the SAPU:  The permittee must not exceed 15 ug of D/F TEQ per Mg (2.1 x 10-4 gr of D/F TEQ per ton) of feed/charge from a group 1 furnace. This limit does not apply if the furnace processes only clean charge (40 CFR Part 63.1505(i)(3)).  However, The permittee may determine the emission standards for a SAPU by applying the group 1 furnace limits on the basis of the aluminum production weight in each group 1 furnace, rather than on the basis of feed/charge.	
E.12 Cast house (MACT)		Secondary Aluminum Processing Unit  The permittee may demonstrate compliance with the emission limits of	The permittee may demonstrate compliance with the emission limits of Requirements E.9 to E.11 by demonstrating compliance with the following individual emission unit limits:  For a group 1 furnace that is not a	40 CFR Part 63.1505(k)(4)
		Requirements E.9 to E.11 (40 CFR Part 63.1505(k)(1)-	melting/holding furnace processing only clean charge, the permittee must not exceed:	

E. Casthouse Op	erations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		(3)) by demonstrating that each emission unit within the SAPU is in compliance with the applicable emission limits of 40 CFR Part 63.1505(i) and (j).	0.40 kg of PM per Mg (0.80 lb of PM per ton) of feed/charge; and 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge; 15 ug of D/F TEQ per Mg (2.1 x 10-4 gr of D/F TEQ per ton) of feed/charge. The D/F limit does not apply if the furnace processes only clean charge.  For an in-line fluxer that uses no reactive flux material, the permittee must not exceed:  0.005 kg of PM per Mg (0.01 lb of PM per ton) of feed/charge; and 0.02 kg of HCl per Mg (0.04 lb of HCl per ton) of feed/charge.	
E.13 Cast house (MACT)	Operating Requiremen ts	The permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace and in-line fluxer that identifies the applicable emission limits and means of compliance, including:  (1) The type of affected source or emission unit (e.g., group 1 furnace, group 2 furnace, in-line fluxer).	The permittee must inspect the labels for each group 1 furnace, group 2 furnace and in-line fluxer at least once per calendar month to confirm that posted labels as required by the operational standard in §63.1506(b) are intact and legible.	40 CFR Part 63.1506(b); and Part 63.1510(c)

E. Casthouse Op	E. Casthouse Operations					
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
		(2) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.				
E.14  Cast house (MACT)	Operating Requirements  And  Monitoring and Compliance Requirements	Feed/Charge Weight  For each affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) of feed/charge, the permittee must:  (1) Except as provided in paragraph (3) of this Requirement, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each	For each affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or ug/Mg (gr/ton) of feed/charge the permittee must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis.  (1) The accuracy of the weight measurement device or procedure must be +1 percent of the weight being measured.	40 CFR Part 63.1506(d)and Part 63.1510(e)		

E. Casthouse Operations					
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
		operating cycle or time period used in the performance test; and (2) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.  (3) The permittee may choose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:  (i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and (ii) All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.	(2) The permittee must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.		

E.15 Cast house (MACT)  Monitoring and Compliance Requiremen ts  Monitoring and compliance requirements for PM, HCI, and D/F emissions.  (1) Maintain the total reactive chlorine flux injection rate for PM, HCI, and D/F emissions.  (2) Each site-specific monitoring plan must document each work practice,		E. Casthouse Operations					
E.15 Cast house (MACT)  Group I Furnace without Add-on Air Pollution Control Devices  (MACT)  Group I Furnace without Add-on Air Pollution Control Devices  The permittee must develop, in consultation with the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  The permittee must develop, in consultation with the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  The permittee must develop, in consultation with the applicable permitting authority, a written site-specific monitoring plan to the applicable permitting authority for Part 63.1506(n); and Part 63.1510(o) are for the OM&M plan that addresses monitoring and compliance requirements for PM, HCI, and DI/F emissions.  (2) Each site-specific monitoring plan must develop, in consultation with the applicable permitting authority, a written site-specific monitoring plan to the applicable permitting authority or and Part 63.1510(o) are for the OM&M plan that addresses monitoring and compliance requirements for PM, HCI, and DI/F emissions.  (2) Each site-specific monitoring plan must develop, in consultation with the applicable permitting authority, a written site-specific monitoring plan to the applicable permitting authority or review 6 months prior to startup.  Part 63.1506(n): and Part 63.1506(n): and Part 63.1510(o)  Part 63.1506(n): and Part 63.1506(n		Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
Cast house (MACT)  Requiremen ts  Devices  And  Add-on Air Pollution Control Devices  With the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority and written site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requirements on air pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for	Emission Unit						
Cast house (MACT)  Requiremen ts  Devices  And  Add-on Air Pollution Control Devices  With the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority and written site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requirements on air pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for							
Cast house (MACT)  Requiremen ts Devices  And Add-on Air Pollution Control Devices  With the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requiremen ts  Compliance Requiremen ts  (1) The site-specific monitoring plan must be part of the OM&M plan that addresses monitoring and compliance requirements for PM, HCI, and D/F emissions.  (2) Each site-specific monitoring plan must document each work practice,							
Cast house (MACT)  Requiremen ts Devices  And Add-on Air Pollution Control Devices  With the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requiremen ts  Compliance Requiremen ts  (1) The site-specific monitoring plan must be part of the OM&M plan that addresses monitoring and compliance requirements for PM, HCI, and D/F emissions.  (2) Each site-specific monitoring plan must document each work practice,							
Cast house (MACT)  Requiremen ts  Devices  And  Add-on Air Pollution Control Devices  With the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority and written site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requirements on air pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for							
Cast house (MACT)  Requiremen ts  Devices  And  Add-on Air Pollution Control Devices  With the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority and written site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requirements on air pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for							
Cast house (MACT)  Requiremen ts  Devices  And  Add-on Air Pollution Control Devices  With the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority and written site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requirements on air pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for							
Cast house (MACT)  Requiremen ts  Devices  And  Add-on Air Pollution Control Devices  With the applicable permitting authority, a written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority and written site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requirements on air pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for							
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ts Devices  MACT)  ts Devices  Written site-specific monitoring plan. The permittee must submit the site-specific monitoring plan to the applicable permitting authority for review 6 months prior to startup.  Monitoring and Compliance Requiremen ts Part of a secondary aluminum processing unit) without addon air pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for							
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group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without addon air pollution control ts  Group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without addon air pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for	(MACT)			permittee must submit the site-specific	Part 63.1510(o)		
Monitoring and of a secondary aluminum processing unit) without addonair pollution control ts  Monitoring and of a secondary aluminum processing unit) without addonair pollution control devices:  (1) Maintain the total reactive chlorine flux injection rate for		And					
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			, ,				
			each operating cycle or time	equipment/design practice, pollution			
period used in the prevention practice, or other measure used to							

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		performance test at or below the average rate established during the performance test.  (2) Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.  (3) Operate each group 1 melting/holding furnace subject to the emission standards in §63.1505(i)(2) using only clean charge as the feedstock.	meet the applicable emission standards.  (3) Each site-specific monitoring plan must include provisions for unit labeling as required in paragraph (c) of this section, feed/charge weight measurement (or production weight measurement) as required in paragraph (e) of this section and flux weight measurement as required in paragraph (j) of this section.  (4) Each site-specific monitoring plan for a melting/holding furnace subject to the clean charge emission standard in §63.1505(i)(3) must include these requirements:  (i) The owner or operator must record the type of feed/charge (e.g., ingot, thermally dried chips, dried scrap, etc.) for each operating cycle or time period used in the performance test; and  (ii) The owner or operator must submit a certification of compliance with the applicable operational standard for clean charge materials in §63.1506(n)(3) for each 6-month reporting period. Each certification must contain the information in §63.1516(b)(2)(iv).  (5) If a site-specific monitoring plan includes a scrap inspection program for monitoring the scrap contaminant level of furnace feed/charge materials, the plan must include	

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
			provisions for the demonstration and implementation of the program in accordance with Requirement 40 CFR Part 63.1510(p). (6) If a site-specific monitoring plan includes a calculation method for monitoring the scrap contaminant level of furnace feed/charge materials, the plan must include provisions for the demonstration and implementation of the program in accordance with all applicable requirements in paragraph Requirement 40 CFR Part 63.1510(q).		
E.16	Operating Requiremen	Group 2 Furnace	The permittee must: (1) Record a description of the materials	40 CFR Part 63.1506(o)	
Cast house (MACT)	ts And Monitoring and Compliance Requiremen ts	For each new or existing group 2 furnace, the permittee must: (1) Operate each furnace using only clean charge as the feedstock. (2) Operate each furnace using no reactive flux.	charged to each furnace, including any nonreactive, non-HAP-containing/non-HAP-generating fluxing materials or agents. (2) Submit a certification of compliance with the applicable operational standard for charge materials for each 6-month reporting period. Each certification must contain the information in §63.1516(b)(2)(v).	and Part 63.1510(r)	
E.17	Operating Requiremen	Corrective Action	As expeditiously as practicable, in accordance with good air pollution control	40 CFR Part 63.1506(p)	
Cast house (MACT)	ts	When a process parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the permittee must	practices for minimizing emissions, corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation. Corrective actions taken must include follow-up actions necessary to return		

E. Casthouse Op		Description of Description	Manitarina Departing and Departing	Danie of Authority
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		initiate corrective action.	the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.	
E.18 Cast house (MACT)	Monitoring and Compliance Requirements	Operation, Maintenance, and Monitoring (OM&M) Plan  The permittee must prepare and implement for each existing affected source and emission unit, a written operation, maintenance, and monitoring (OM&M) plan.	Submit the plan to Ecology for review and approval on or before September 24, 2002. Pending approval by Ecology of an initial or amended plan, the permittee must comply with the provisions of the submitted plan. Each plan must contain the following information:  (1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.  (2) A monitoring schedule for each affected source and emission unit.  (3) Procedures for the proper operation and maintenance of each process unit used to meet the applicable emission limits or standards in §63.1505.  (4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:  (i) Calibration and certification of accuracy of each monitoring device,	40 CFR Part 63.1510(b)

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Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Emission Unit				
			at least once every 3 months,	
			according to the manufacturer's	
			instructions; and	
			(ii) Procedures for the quality control	
			and quality assurance of continuous	
			emission or opacity monitoring	
			systems as required by the general	
			provisions in subpart A of this part.	
			(5) Procedures for monitoring process	
			parameters, and if applicable, the procedure	
			to be used for determining charge/feed (or	
			throughput) weight if a measurement device	
			is not used.	
			(6) Corrective actions to be taken when	
			process or operating parameters deviate from	
			the value or range established in number (1)	
			above of this Requirement, including:	
			(i) Procedures to determine and	
			record the cause of an deviation or	
			excursion, and the time the deviation	
			or excursion began and ended; and	
			(ii) Procedures for recording the	
			corrective action taken, the time	
			corrective action was initiated, and the	
			time/date corrective action was	
			completed.	
			(7) A maintenance schedule for each process	
			and control device that is consistent with the	
			manufacturer's instructions and	
			recommendations for routine and long-term	

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
			maintenance.  (8) Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in Requirement E.15 (40 CFR Part 63.1510(o)) for each group 1 furnace not equipped with an add-on air pollution control device.  Any subsequent changes to the plan must be submitted to Ecology for review and approval.			
			(The permittee submitted a plan to Ecology on March 24, 2003)			
E.19	Monitoring and	Total Reactive Flux Injection Rate	(1) The permittee must install, calibrate, operate, and maintain a device to	40 CFR Part 63.1510(j)		
Cast house (MACT)	Compliance Requiremen ts	These requirements apply to group 1 furnaces or in-line fluxers  The permittee must install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emission unit.	continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emission unit.  (i) The monitoring system must record the weight for each 15-minute block period, during which reactive flux injected to each affected source or emission unit.  (ii) The accuracy of the weight measurement device must be +/- 1 percent of the weight of the reactive component of the flux being measured. The permittee may apply to Ecology for permission to use a weight measurement device of alternative			

Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
mission Unit				
		(i) The monitoring system	accuracy in cases where the reactive flux flow	
		must record the weight for	rates are so low as to make the use of a	
		each 15-minute block	weight measurement device of +/-1 percent	
		period, during which	impracticable. A device of alternative	
		reactive fluxing occurs,	accuracy will not be approved unless the	
		over the same operating	permittee provides assurance through data	
		cycle or time period used	and information that the affected source will	
		in the performance test.	meet the relevant emission standards.	
		(ii) The accuracy of the	(iii) The permittee must verify the calibration	
		weight measurement device	of the weight measurement device in	
		must be +/- percent of the	accordance with the schedule specified by	
		weight being measured. The	the manufacturer, or if no calibration schedule	
		permittee may apply to the	is specified, at least once every 6 months.	
		permitting authority for	(2) For each operating cycle or time period	
		permission to use a weight	used in the performance test, the permittee	
		measurement device of	shall calculate and record the gaseous or	
		alternative accuracy in cases	liquid reactive flux injection rate (kg/Mg or	
		where the reactive flux flow	lb/ton using the procedure in Requirement	
		rates are so low as to make	E.31 (40 CFR Part 63.1512(o)).	
		the use of a weight	(3) The permittee shall record, for each 15-	
		measurement device of +1	minute block period during each operating	
		percent impracticable. A	cycle or time period used in the performance	
		device of alternative	test during which reactive fluxing occurs, the	
		accuracy will not be	time, weight, and type of flux for each	
		approved unless the owner	addition of:	
		or operator provides	(i) Gaseous or liquid reactive flux other	
		assurance through data and	than chlorine; and	
		information that the affected	(ii) Solid reactive flux.	
		source will meet the relevant	(4) The permittee shall, for each operating	
		emission standards.	cycle or time period used in the performance	

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
			test, calculate and record the total reactive flux injection rate using the procedure in Requirement E.31 (40 CFR Part 63.1512(o)). (5) The permittee may apply to Ecology for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.	
E.20 Cast house (MACT)	Monitoring and Compliance Requiremen ts	Site-specific Requirements for Secondary Aluminum Processing Units	(1) For each secondary aluminum processing unit the permittee must include, within the OM&M plan prepared in accordance with Requirement E.18 (40 CFR Part 63.1510(b)), the following information:  (i) The identification of each emission unit in the secondary aluminum processing unit;  (ii) The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;  (iii) The emission limit calculated for	40 CFR Part 63.1510(s)

E. Casthouse Op Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
	i arameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Dasis of Authority
Emission Unit			each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;  (iv) Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart; and  (v) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in §63.1510(t). (Condition No. E.21)  (2) The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:  (i) Any averaging among emissions of differing pollutants;  (ii) The inclusion of any affected sources other than emission units in a secondary aluminum processing unit;  (iii) The inclusion of any emission unit while it is shutdown; or  (iv) The inclusion of any periods of startup, shutdown, or malfunction in	

E. Casthouse Op		Description of Description	Manitarina Departing and Departing	Deele of Authority
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
LITHSSION OTHE			emission calculations. (3) To revise the SAPU compliance provisions within the OM&M plan prior to the	
			end of the permit term, the permittee must submit a request to Ecology containing the information required by paragraph (s)(1) of	
			this section and obtain approval of Ecology prior to implementing any revisions.	
E.21	Monitoring and	Secondary Aluminum Processing Unit	The permittee shall calculate the 3-day, 24-hour rolling average, by the following	40 CFR Part 63.1510(t)
Cast house (MACT)	Compliance Requiremen ts	Except as provided in Requirement E.22 (40 CFR Part 63.1510(u)), the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCI, and D/F for each secondary aluminum processing unit on a daily basis.	procedure:  (1) Calculate and record the total weight of material charged to each emission unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in Requirement E.14 (40 CFR Part 63.1510(e)). If the permittee chooses to comply on the basis of weight of aluminum produced by the emission unit, rather than weight of material charged to the emission unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.  (2) Multiply the total feed/charge weight to the emission unit, or the weight of aluminum produced by the emission unit, for each emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the	

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
			performance test) to provide emissions for each emission unit for the 24-hour period, in pounds. (3) Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU. (4) Compute the 24-hour daily emission rate using the following equation: $E_{day} = \frac{\sum_{i=1}^{n} (T_i \times ER_i)}{\sum_{i=1}^{n} T_i}$	
			Where, E <sub>day</sub> = The daily PM, HCl, or D/F emission rate for the secondary aluminum processing unit for the 24-hour period; T <sub>i</sub> = The total amount of feed, or aluminum produced, for emission unit i for the 24-hour period (tons); ER <sub>i</sub> = The measured emission rate for emission unit i as determined in the performance test (lb/ton or ug/Mg of feed/charge); and n = The number of emission units in the	

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
			secondary aluminum processing unit. (5) Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.		
E.22 Cast house (MACT)	Monitoring and Compliance Requiremen ts	Secondary Aluminum Processing Unit Compliance by Individual Emission Unit Demonstration  As an alternative to the procedures of Requirement E.21 (40 CFR Part 63.1510(t)), the permittee may demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.		40 CFR Part 63.1510(u)	
E.23	Performanc e Test/	Site-specific Test Plan	Submit the site-specific test plan to Ecology at least 60 calendar days before the	40 CFR Part 63.1511(a);	
Cast house (MACT)	Compliance Demonstrati on General Requiremen ts	Prior to conducting a performance test required by this subpart, the owner or operator must prepare and submit a site-specific test	performance test is scheduled to take place (simultaneously with the notification of intention to conduct a performance test required by 40 CFR Part 63.7(b)). The test plan shall include a test program summary,	Part 63.7(b); and Part 63.7(c)	

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
		plan meeting the requirements in §63.7(c).	the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program. Data quality objectives are the pretest expectations of precision, accuracy, and completeness of data.			
			The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision; an example of internal QA is the sampling and analysis of replicate samples.			
			The external QA program shall include, at a minimum, application of plans for a test method performance audit (PA) during the performance test. The PA's consist of blind audit samples provided by the Administrator and analyzed during the performance test in order to provide a measure of test data bias.			
			The external QA program may also include systems audits that include the opportunity for on-site evaluation by the Administrator of instrument calibration, data validation, sample			
			logging, and documentation of quality control data and field maintenance activities.			
E.24	Performanc e Test/	Initial Performance Test	Following approval of the site-specific test plan, and prior to September 24, 2002, and	40 CFR Part 63.1511(b)		
Cast house	Compliance	Following approval of the	allowing proper time for the permittee to			

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Emission Unit (MACT)	Demonstrati on General Requiremen ts	site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emission unit, and report the results in the notification of	complete and submit the plan to Ecology for approval:  (1) The permittee must conduct each test while the affected source or emission unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.	
		compliance status report as described in §63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in subpart A of this part and this subpart.	<ul> <li>(2) Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.</li> <li>(3) Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle.</li> </ul>	
			(4) Where multiple affected sources or emission units are exhausted through a common stack, pollutant sampling for each run must be conducted for a period of time for all affected sources or emission units to complete 1 entire process operating cycle or for 24 hours, whichever is shorter.  (5) Initial compliance with an applicable emission limit or standard is demonstrated if	

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
			the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.	
E.25	Performanc e Test/	Test Methods		40 CFR Part 63.1511(c) and (d)
Cast house (MACT)	Compliance Demonstrati on General Requiremen ts	The permittee must use the following methods in appendix A to 40 CFR part 60 to determine compliance with the applicable emission limits or standards:  (1) Method 1 for sample and velocity traverses.  (2) Method 2 for velocity and volumetric flow rate.  (3) Method 3 for gas analysis.  (4) Method 4 for moisture content of the stack gas.  (5) Method 5 for the concentration of PM.  (6) Method 9 for visible emission observations.  (7) Method 23 for the concentration of D/F.		
E.26	Performanc e Test/	Repeat Tests.	The permittee must conduct a performance test every 5 years following the initial	40 CFR Part 63.1511(e)
Cast house (MACT)	Compliance Demonstrati on General		performance test. Conduct the second performance test on or before March 24, 2008.	333(0)

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
	Requiremen ts					
E.27 Cast house (MACT)	•	Establishment of Monitoring and Operating Parameter Values.	The permittee must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by §63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the owner or operator must use the appropriate procedures in this section and submit the information required by §63.1515(b)(4)(Condition No. E40) in the notification of compliance status report. The owner or operator may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the applicable permitting authority:  (1) The complete emission test report(s) used as the basis of the parameter(s) is submitted.  (2) The same test methods and procedures as required by this subpart	40 CFR Part 63.1511(g)		
			were used in the test. (3) The permittee certifies that no design or work practice changes have been made			
			to the source, process, or emission control			

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
			equipment since the time of the report.  (4) All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.	
E.28 Cast house (MACT)	Performanc e Test/ Compliance Demonstrati on Requiremen ts and Procedures	Group 1 Furnace (including melting holding furnaces) Without Add-on Air Pollution Control Devices.	Include in the site-specific test plan (Requirement E.23), conduct required performance tests (Requirement E.24) and include in the OM&M plan (Requirement E.18).	40 CFR Part 63.1512(e)
E.29 Cast house (MACT)	Performanc e Test/ Compliance Demonstrati on Requiremen ts and Procedures	In-line Fluxer.  (1) The permittee must conduct a performance test to measure emissions of HCl and PM at the outlet of the control device. If the in-line fluxer uses no reactive flux materials, emission tests for PM and HCl are not required.  (2) The permittee may choose to determine the rate of reactive flux addition to the in-line fluxer and assume, for the purposes of demonstrating compliance	Include in the site-specific test plan (Requirement E.23), conduct required performance tests (Requirement E.24) and include in the OM&M plan (Requirement E.18).	40 CFR Part 63.1512(h)

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Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority	
		with the SAPU emission limit, that all reactive flux added to the in-line fluxer is emitted. Under these circumstances, permittee is not required to conduct an emission test for HCI.			
E.30	Performanc e Test/ Compliance Demonstrati on Requiremen ts and Procedures	Secondary aluminum processing unit.  The permittee must conduct performance tests as described below in this Requirement. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and µg TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in §63.1510(t). A performance test is required for:  (1) Each group 1 furnace	Include in the site-specific test plan (Requirement E.23), conduct required performance tests (Requirement E.24) and include in the OM&M plan (Requirement E.18).	40 CFR Part 63.1512(j)	

Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Emission Unit	- diamotor	Boomption of Requirement	wormorning, responding and resconding	Baoio or riamonty
		processing only clean		
		charge to measure		
		emissions of PM and either:		
		(i) Emissions of HCI (for		
		the emission limit); or		
		(ii) The mass flow rate of		
		HCl at the inlet to and		
		outlet from the control		
		device (for the percent		
		reduction standard).		
		(2) Each group 1 furnace		
		that processes scrap other		
		than clean charge to		
		measure emissions of PM		
		and D/F and either:		
		(i) Emissions of HCl (for		
		the emission limit); or		
		(ii) The mass flow rate of HCl		
		at the inlet to and outlet		
		from the control device		
		(for the percent reduction		
		standard).		
		(3) Each in-line fluxer to		
		measure emissions of PM		
		and HCI.		
i.31	Performanc	Feed/charge Weight	During the emission test(s) conducted to	40 CFR Part
	e Test/	Measurement.	determine compliance with emission limits in	63.1512(k)
ast house	Compliance		a kg/Mg (lb/ton) format, the permittee with an	- ( )
MACT)	Demonstrati		affected source or emission unit, subject to	
•	on		an emission limit in a kg/Mg (lb/ton) of	

E. Casthouse Op		Description of Description (	Manifeston Deposition and Deposit	Dania of Audia it
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
	Requiremen ts and Procedures		feed/charge format, must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight.	
			An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight.	
E.32 Cast house (MACT)	Performanc e Test/ Compliance Demonstrati on Requiremen ts and Procedures	Flux Injection Rate.  The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.	(1) Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl and D/F tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs; (2) Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs; (3) Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid	40 CFR Part 63.1512(o)

E. Casthouse Op	erations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
			$W_t = F_1W_1 + F_2W_2$	
			Where,	
			$W_t$ = Total chlorine usage, by weight; $F_1$ = Fraction of gaseous or liquid flux that is chlorine; $W_1$ = Weight of reactive flux gas injected; $F_2$ = Fraction of solid reactive chloride flux that is chlorine (e.g., $F$ = 0.75 for magnesium chloride; and $W_2$ = Weight of solid reactive flux;	
			(4) Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs; and (5) If a solid reactive flux other than magnesium chloride is used, the owner or operator must derive the appropriate proportion factor subject to approval by the applicable permitting authority.	
E.33	Performanc e Test/	Labeling.	The permittee shall submit compliance status report annually.	40 CFR Part 63.1512(r)
Cast house (MACT)	Compliance Demonstrati on Requiremen ts and	The owner or operator of each group 1 furnace, group 2 furnace and in-line fluxer must submit the information described in §63.1515(b)(3)	,	

E. Casthouse Operations						
Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
Emission Unit						

	Procedures	as part of the notification of compliance status report to document conformance with the operational standard in §63.1506(b).		
E.34	Equations	PM, HCl and D/F Emission	The permittee shall use the following	40 CFR Part
	for	Limits	equation to determine compliance with an	63.1513(b)
Cast house	Determining Compliance		emission limit for PM, HCl, and D/F:	
(MACT)	Compilance		$E = \frac{C \times Q \times K_1}{P}$	
			Where,	
			E= Emission rate of PM, HCl, or D/F, kg/Mg	
			(lb/ton) of feed;	
			C = Concentration of PM, HCl, or D/F,	
			g/dscm (gr/dscf);	
			Q = Volumetric flow rate of exhaust gases,	
			dscm/hr (dscf/hr);	
			$K_1$ = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and	
			P = Production rate, Mg/hr (ton/hr).	

E. Casthouse Op Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Emission Unit	i arameter			·
E.35	Equations for	Conversion of D/F Measurements to TEQ Units.	To convert D/F measurements to TEQ units, the permittee must use the procedures and	40 CFR Part 63.1513(d)
Cast house (MACT)	Determining Compliance		equations in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and –Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia, NTIS no. PB 90-145756.	
E.36 Cast house	Equations for Determining	Secondary Aluminum Processing Unit - PM	The permittee shall use the following equation to compute the mass-weighted PM emissions for a secondary aluminum	40 CFR Part 63.1513(e)(1)
	Compliance		processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit (E <sub>cPM</sub> ) is less than or equal to the emission limit for the secondary aluminum processing unit (L <sub>cPM</sub> ) calculated using the equation in Requirement E.9 (40 CFR Part 63.1505(k)(1)).	
			$E_{C_{PM}} = \frac{\displaystyle\sum_{i=1}^{n} (E_{ti_{PM}} \times T_{ti})}{\displaystyle\sum_{i=1}^{n} (T_{ti})}$	
			Where,  E <sub>cPM</sub> = The mass-weighted PM emissions for the secondary aluminum processing unit;  E <sub>tiPM</sub> = Measured PM emissions for individual	

E. Casthouse Op		Description of Descriptions	Manitaring Departing and Departure	Doois of Authority
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
			emission unit i; $T_{ti}$ = The average feed rate for individual emission unit i during the operating cycle or performance test period; and n = The number of emission units in the secondary aluminum processing unit.	
E.36  Cast house (MACT)	Equations for Determining Compliance	Secondary Aluminum Processing Unit - HCI	The permittee shall use the following equation to compute the aluminum massweighted HCl emissions for the secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit (E <sub>cHCl</sub> ) is less than or equal to the emission limit for the secondary aluminum processing unit (L <sub>cHCl</sub> ) calculated using the equation Requirement E.10 (40 CFR Part 63.1505(k)(2)).	40 CFR Part 63.1513(e)(2)
			$E_{\text{CHCI}} = \frac{\displaystyle\sum_{i=1}^{n} (E_{\text{tiHCI}} \times T_{ti})}{\displaystyle\sum_{i=1}^{n} (T_{ti})}$ Where, $E_{\text{cHCI}} = \text{The mass-weighted HCI emissions for the secondary aluminum processing unit; and } E_{\text{tiHCI}} = \text{Measured HCI emissions for individual emission unit i.}$	

E. Casthouse Op	erations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
E.38  Cast house (MACT)	Equations for Determining Compliance	Secondary Aluminum Processing Unit – D/F	Use the following equation to compute the aluminum mass-weighted D/F emissions for the secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit ( $L_{\text{cD/F}}$ ) calculated using the equation in Requirement E.11 (40 CFR Part 63.1505(k)(3)). $\sum_{i=1}^{n} (E_{\text{tiD/F}} \times T_{ti})$ $\sum_{i=1}^{n} (T_{ti})$ Where, $E_{\text{cD/F}} = \text{The mass-weighted D/F emissions for the secondary aluminum processing unit; and } E_{\text{tiD/F}} = \text{Measured D/F emissions for individual emission unit i.}}$	40 CFR Part 63.1513(e)(3)
E.39 Cast house (MACT)		Secondary Aluminum Processing Unit	As an alternative to using the equations in Requirements E.36 to E.38 (40 CFR Part 63.1513(e)(1), (2), and (3)), the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in §63.1505(i) and that each existing in-line fluxer is in compliance with the	40 CFR Part 63.1513(e)(4)

E. Casthouse Op Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Emission Unit	T arameter	Description of Requirement	Widnitoring, Reporting and Recordice ping	Dasis of Authority
			emission limits for a new in-line fluxer in	
			§63.1505(j).	
E.40	Notifications	Notification of Compliance	By May 23, 2003 (within 60 days after the	40 CFR Part
		Status Report	compliance date), the permittee must submit	63.1515
Cast house (MACT)			a notification of compliance status report.	
,			The notification must be signed by the	
			responsible official who must certify its	
			accuracy. A complete notification of	
			compliance status report must include the	
			information specified in below. If the	
			permittee submits the information specified in	
			this section at different times or in different	
			submittals, later submittals may refer to earlier submittals instead of duplicating and	
			resubmitting the information previously	
			submitted.	
			Submitted.	
			A complete notification of compliance status	
			report must include:	
			(1) All information required in §63.9(h). The	
			permittee must provide a complete	
			performance test report for each affected	
			source and emission unit for which a	
			performance test is required. A complete	
			performance test report includes all data, associated measurements, and calculations	
			(including visible emission and opacity tests).	
			1	
			(2) The approved site-specific test plan and performance evaluation test results for each	

E. Casthouse Op	E. Casthouse Operations					
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority		
			continuous monitoring system (including a continuous emission or opacity monitoring system).  (3) Unit labeling as described in §63.1506(b), Condition No. E.13 including process type or furnace classification and operating requirements.  (4) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.  (9) Approved OM&M plan (including sitespecific monitoring plan for each group 1 furnace with no add-on air pollution control device).  (10) Startup, shutdown, and malfunction plan, with revisions.			
E.40 Cast house (MACT)	Startup, Shutdown, and Malfunction Plan/Report s.	The permittee must develop and implement a written plan as described in §63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of	Upon startup the permittee shall develop a written plan that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunction process and control systems used to comply	40 CFR Part 63.1516(a) ???		

E. Casthouse Operations				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by §63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in §63.6(e)(3).	with the MACT emission standards.  In addition to the information required in §63.6(e)(3), the plan must include: (1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and (2) Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.	
E.42 Cast house (MACT)	Excess Emissions/S ummary Report.	(1) A report must be submitted if any of these conditions occur during a 6-month reporting period: (iv) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable	As required by §63.10(e)(3), the owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in §63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period.  Each report must include each of these certifications, as applicable:  (1) For each group 1 melting/holding furnace without add-on air pollution control devices	40 CFR Part 63.1516(b)

E. Casthouse Op	erations			
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		scrap, or other approved operating parameter).  (v) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in §63.6(e)(3).  (vi) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.  (vii) A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.  (3) The permittee must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular	and using pollution prevention measures that processes only clean charge material: "Each group 1 furnace without add-on air pollution control devices subject to emission limits in §63.1505(i)(2) processed only clean charge during this reporting period."  (2) For each group 2 furnace: "Only clean charge materials were processed in any group 2 furnace during this reporting period, and no fluxing was performed or all fluxing performed was conducted using only nonreactive, non-HAP-containing/non-HAP-generating fluxing gases or agents, except for cover fluxes, during this reporting period."	

E. Casthouse Operations				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
		type of emission point tested.		
E.43	Annual Compliance	For the purpose of annual certifications of compliance		40 CFR Part 63.1516(c)
Cast house (MACT)	Certification s.	required by 40 CFR part 70 or 71, the owner or operator must certify continuing compliance based upon the following conditions: (1) Any period of excess emissions, as defined in 40CFR Part 63.1516(b)(1), that occurred during the year were reported as required by this subpart; and (2) All monitoring, recordkeeping, and reporting requirements were met during the year.		
E.44  Cast house (MACT)	Records	As required by 40 CFR Part 63.10(b), the permittee shall maintain files of all information (including all reports and notifications)	(1) The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at	40 CFR Part 63.1517(a) and
		required by the general provisions and this subpart Subpart RRR).	the facility. The remaining 3 years of records may be retained off site.  (2) The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and  (3) The permittee may report required	40 CFR Part 63.10(b)

E. Casthouse Op Condition No. &	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
Emission Unit	laidinotoi	2 description of resquirement	incinioning, responding and recognitioning	Dadio of Additionty
			information on paper or on a labeled	
			computer disk using commonly available and	
			Ecology-compatible computer software.	
E.44	Records	Additional Recordkeeping	In addition to the general records required by	40 CFR Part
			§63.10(b), the permittee must maintain	63.1517(b)
Cast house			records of:	
(MACT)			(1) For each group 1 furnace (with or without	
			add-on air pollution control devices) or in-line	
			fluxer, records of 15-minute block average	
			weights of gaseous or liquid reactive flux	
			injection, total reactive flux injection rate and	
			calculations (including records of the identity,	
			composition, and weight of each addition of gaseous, liquid or solid reactive flux),	
			including records of any period the rate	
			exceeds the compliant operating parameter	
			value and corrective action taken.	
			(2) For each continuous monitoring system,	
			records required by §63.10(c). ???	
			(3) For each affected source and emission	
			unit subject to an emission standard in kg/Mg	
			(lb/ton) of feed/charge, records of	
			feed/charge (or throughput) weights for each	
			operating cycle or time period used in the	
			performance test.	
			(4) Approved site-specific monitoring plan for	
			a group 1 furnace without add-on air pollution	
			control devices with records documenting	
			conformance with the plan.	
			(5) Records of all charge materials for each	

E. Casthouse Op				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
mission Unit			group 1 melting/holding furnaces without air pollution control devices processing only clean charge.  (6) Records of all charge materials and fluxing materials or agents for a group 2 furnace.  (7) Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.  (8) Records of annual inspections of emission capture/collection and closed vent systems.  (9) Records for any approved alternative monitoring or test procedure.  (10) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:  (i) Startup, shutdown, and malfunction plan;  (ii) For major sources, OM&M plan; and  (iii) Site-specific secondary aluminum processing unit emission plan (if applicable).  (11) For each secondary aluminum processing unit, records of total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour	

E. Casthouse Operations				
Condition No. & Emission Unit	Parameter	Description of Requirement	Monitoring, Reporting and Recordkeeping	Basis of Authority
			rolling average emissions.	

#### SECTION III: STANDARD TERMS AND CONDITIONS OF THE PERMIT

#### III.1. Duty to comply

WAC 173-401-620(2)(a)

The permittee must comply with all conditions of this chapter 401 permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

# III.2. Need to halt or reduce activity not a defense

WAC 173-401-620(2)(b)

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit."

#### III.3. Permit actions

WAC 173-401-620(2)(c)

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

## III.4. Property rights

WAC 173-401-620(2)(d)

This permit does not convey any property rights of any sort, or any exclusive privilege.

#### III.5. Duty to Provide Information

WAC 173-401-620(2)(e)

The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.

# III.6. Permit fees

WAC 173-401-620(2)(f)

The permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW.

#### III.7 Emissions Trading

WAC 173-401-620(2)(g)

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

#### III.8 Severability Clause

WAC 401-620(2)(h)

If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.

### III.9 Permit Appeals

WAC 173-401-620(2)(i)

The permittee may appeal this permit or any conditions in it only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.

#### III.10 Permit Continuation

WAC 173-401-620(2)(j)

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted.

# III.11 Federally Enforceable Requirements

WAC 173-401-625

All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable by EPA and citizens under the FCAA, unless they are specifically designated as not federally enforceable.

#### III.12 Reopening for Cause

WAC 173-401-730

This permit shall be reopened and revised under any of the following circumstances:

- (a) Additional applicable requirements become applicable when the remaining permit term is greater than three years. Such reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).
- (b) Additional requirements (including excess emissions requirements) become applicable under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated in the permit.
- (c) Ecology determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- (d) Ecology determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Procedures to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.

## III.13 Tampering and False Statements

WAC 173-400-105(7) and (8) and 40 CFR 70.11(a)

No person shall make any false materials statement, representation or certification in any form, notice or report required in this permit. No person shall render inaccurate any monitoring device or method required under this permit.

III.14 Section 112(j) Industrial Boiler and Process Heater Phase II MACT Application 40 CFR 63.50(c) and WAC 173-400-075(5)

On or before April 28, 2004 the Permittee shall file a Part 2 application for a MACT determination, if by that date EPA has not promulgated a generally applicable federal MACT standard for the Industrial Boiler and Process Heater source category. The application need only cover those emission points and hazardous air pollutants that would be subject to control under the MACT standard proposed for comment at 68 Fed. Reg. 1660 (January 13, 2003).

#### SECTION IV: GENERAL TERMS AND CONDITIONS OF THE PERMIT

Recordkeeping Terms & Conditions

## IV.1 Monitoring Records

WAC 173-401-615(2)(a) and WAC 173-400-105

The permittee shall keep records of any periodic and continuous monitoring required by this permit. These records shall include the following, where applicable:

- (i) The date, place as defined in the permit, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used;
- (v) The results of such analyses; and
- (vi) The operating conditions existing at the time of sampling or measurement;

# IV.2 Inspection Checklists

WAC 173-401-615(1)(b)

Where the permittee is required to use and maintain an inspection checklist, the checklist must contain, at a minimum, the following information:

- (i) The person conducting the inspection
- (ii) The date/time of the inspection
- (iii) Location of the inspection
- (iii) The observations made during the inspection
- (iv) Corrective actions taken if any
- (v) The date and time corrective action was initiated and completed

### IV.3 Changes at Source

WAC 173-401-615(2)(b)

The permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

#### IV.4 Records Retention

WAC 173-401-615(2)(c)

The permittee shall retain records of all required monitoring data and support information for a period of 5 years from the date of monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all data from continuous monitoring instrumentation, and copies of all reports required by this permit.

## IV.5 Recording of Permit Deviations

WAC 173-401-615(3)(b)

The source shall maintain a contemporaneous record of all deviations including the date and nature of the deviation.

## **Reporting Terms & Conditions**

#### IV.6 Certifications

WAC 173-401-520

Any application form, report, or compliance certification submitted pursuant to Chapter 173-401 WAC shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 173-401 WAC shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

## IV.7 Monthly Reports

WAC 173-401-615(3)(a) and WAC 173-415-060

Results of monitoring shall be reported within 30 days of the last calendar day of each month. All instances of deviations from permit requirements must be clearly identified in such reports.

#### IV.8 Permit Deviations/Excess Emissions WAC 173-401-615(3)(b) and WAC 173-400-107

The permittee shall promptly submit a report of any deviations from permit conditions.

- A. For purposes of this permit, submitting a report "promptly" means the following: (1) if the deviation presents a potential threat to human health or safety, the report shall be made as soon as possible but no later than 12 hours after the discovery of the deviation; (2) for other deviations, "promptly" means that the deviations are identified in the respective monthly report.
- B. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. The permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107.

#### IV.9 Emission Inventory

WAC 173-415-080 and WAC 173-400-105(1)

The permittee shall submit an inventory of emissions, as specified in WAC 173-415-080, from the source each year no later than 105 days after the end of the calendar year. The permittee shall maintain records of information necessary to substantiate any reported emissions.

- A. The permittee shall continue to comply with applicable requirements with which the permittee is already in compliance;
- B. The permittee shall meet applicable requirements that will become effective during the permit period on a timely basis;
- C. The permittee shall submit a report to the Department of Ecology and to EPA Region 10 within 105days after close of the calendar year, and every year thereafter, certifying compliance with the terms and conditions contained in this permit for the previous calendar year. The initial compliance certification shall cover the period from when the permit is effective to the end of the calendar year. The certification shall describe the following:
  - i. the permit term or condition that is the basis of the certification;
  - ii. the compliance status;
  - iii. whether compliance was continuous or intermittent; and
  - iv. the methods used for determining compliance, currently and over the reporting period consistent with required monitoring.
- D. The permittee is not required to certify compliance for insignificant emission units or activities. [WAC 173-401-530(2)(d)]

# IV.11 Report Address

All reports, renewal applications, and compliance certifications required by this permit shall be submitted to:

Department of Ecology Industrial Section P.O. Box 47706 Olympia, WA 98504-7706

Compliance certification shall also be submitted to:

Environmental Protection Agency Air Operating Permits, Region 10 1200 Sixth Avenue, OAQ-108 Seattle, WA 98101-1128

Other Terms & Conditions of the Permit

IV.12 Asbestos WAC 173-400-075

The permittee shall comply with 40 CFR Part 61, subpart M (asbestos NESHAP) and WAC 173-400-075 when conducting any renovation or demolition at the facility.

### IV.13 Concealment and Masking

WAC 173-400-040(7)

The permittee shall not install or use any means that conceal or mask an emission of an air contaminant that would otherwise violate provisions in this permit.

The permittee shall allow the permitting authority or an authorized representative to perform the following upon presentation of credentials and other documents as may be required by law:

- (a) Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by WAC 173-400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

# IV. 15 Application and Issuance of a Renewal Permit

WAC 173-401-710(1)&(2)

The permittee shall submit a complete permit renewal application to Ecology no later than six months, but no earlier than 18 months, prior to the expiration date of the existing permit. Permits being renewed are subject to the same procedural requirements, including those for public participation, affected state and EPA review that apply to the initial permit.

#### IV.16 Stratospheric Ozone Protection

40 CFR Section 82 and RCW 70.94.970 (the RCW is a state-only requirement)

- A. The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditions (MVACs) in Subpart B:
  - i. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to § 82.156.
  - ii. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
  - iii. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to § 82.161.
  - iv. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to § 82.166 ("MVAC-like appliance" is defined at § 82.152.)
  - v. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
  - vi. Owners/operators of appliances normally containing 50 or more pounds or refrigerant purchased and added to such appliances pursuant to § 82.166."
- B. Permittee may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SANP), 40 CFR

- Part 82, Subpart G, without a permit revision but shall not switch to a substitute listed as unacceptable pursuant to such program. [40 CFR 82.174]
- C. Any certified technician employed by Permittee shall keep a copy of their certification at their place of employment. [40 CFR 82.166(1)]
- D. The Permittee shall not willfully release any regulated refrigerant and shall use refrigerant extraction equipment to recover regulated refrigerant that would otherwise be released into the atmosphere. [RCW 7070.94.970(2), 970(4)] State Only
- E Compliance with this term and condition will be demonstrated by using a certified contractor or employee.

## IV.17 Insignificant Emission Units

WAC 173-401-530(2)(b)

The generally applicable requirements that apply to IEUs are, WAC 173-415-030, WAC 173-400-040, WAC 173-400-050(1) & (3), and WAC 173-400-060.

# IV.18 Providing Additional Data

WAC 173-415-060(2)

For Ecology to evaluate a plant's emissions or emission control program, each primary aluminum plant shall furnish other data requested by Ecology.

IV.19 Section 112(j) Industrial Boiler and Process Heater Phase II MACT Application 40 CFR 63.50(c) and WAC 173-400-075(5)

On or before April 28, 2004 the Permittee shall file a Part 2 application for a MACT determination, if by that date EPA has not promulgated a generally applicable federal MACT standard for the Industrial Boiler and Process Heater source category. The application need only cover those emission points and hazardous air pollutants that would be subject to control under the MACT standard proposed for comment at 68 Fed.Reg. 1660 (January 13, 2003).

#### SECTION V: PERMIT SHIELD/ INAPPLICABLE REQUIREMENTS

Pursuant to WAC 173-401-640(1), compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements identified in this permit, as of the date of permit issuance. This permit shield does not exempt the permittee from requirements enacted after the permit issuance date. This permit shield shall not apply to any insignificant emission unit or activity designated under WAC 173-401-530. [WAC 173-401-530]

Pursuant to WAC 173-401-640(2), the Department of Ecology has determined that the requirements listed below do not apply to the facility, as of the date of permit issuance, for the reasons specified.

The permit shield shall apply to the inapplicable requirements listed in the table below:

INAPPLICABLE REQUIREMENTS				
Regulatory Citation	Reason for Inapplicability			
40 CFR 60, Subpart S Standards of Performance for	The facility was constructed before			
Primary Aluminum Reduction Plants	October 23, 1974 and was not modified or			
	reconstructed after that date.			
RCW 70.94.610 Burning Used Oil Fuel in Land-based	The facility does not burn used oil.			
Facilities				
RCW 70.94.650 Burning Permits for Weed Abatement,	The facility does not engage in any of the			
Fire Fighting Instruction and Agricultural Activities	covered burning activities.			
RCW 70.94.743 Outdoor BurningAreas Where	The facility does not conduct outdoor			
Prohibited	burning			
RCW 70.94.775 Outdoor BurningFires Prohibited—	The facility does not conduct outdoor			
Exceptions	burning			
WAC 173-400-115 New Source Performance Standards				
in 40 CFR Part 60 Subpart S	AL CHECK TO THE TENTE OF THE TE			
WAC 173-400-050(2) (9/20/93) Emission Standards for	None of the facility's emission units are			
Incinerators	"incinerators" as that term is defined in WAC 173-400-030.			
WAC 173-400-120 Bubble Rules				
WAC 173-400-120 Bubble Rules WAC 173-400-131 Issuance of Emission Reduction	The facility has not applied for a bubble.  The facility has not applied for emission			
Credits	reduction credits.			
WAC 173-400-136 Use of Emission Reduction Credits	The facility does not have and has not			
WAC 175-400-150 OSE OF ETHISSION NEGLECTION CIECLIS	used emission reduction credits.			
WAC 173-400-151 (9/20/93) Retrofit Requirements For	The facility has not been determined to			
Visibility Protection	cause or contribute to a visibility			
Tolomy Trotosion	impairment.			
Chapter 173-421 WAC Emission Control Systems	The facility does not perform work on			
	motor vehicle emission systems.			
Chapter 173-425 WAC (9/17/90) Open Burning	The facility's operations do not include			
. , , , ,	open burning.			
Chapter 173-433 WAC (9/17/90) Solid Fuel Burning	The facility's emission units are "solid fuel			
Device Standards	burning devices" as defined in WAC 173-			
	433-030(9).			

INAPPLICABLE REQUIREMENTS				
Regulatory Citation	Reason for Inapplicability			
Chapter 173-434 WAC (9/17/90) Solid Waste Incinerator Facilities	None of the facility's emission units are incinerators burning a solid waste fuel, within the meaning of WAC 173-434-030.			
WAC 173-490-030 (2/19/91) Registration and Reporting Petroleum liquid storage tanks.	The facility does not have any petroleum liquid storage tanks.			
WAC 173-490-040(2) (2/19/91) Petroleum Liquid Storage Tanks	The facility does not have any petroleum liquid storage tanks.			
WAC 173-490-040(6) (2/19/91) Surface Coaters	It does not apply to any of the emission units at the facility.			
WAC 173-490-040(7) (2/19/91) Open Top Vapor Degreasers	It does not apply to any of the emission units at the facility.			
WAC 173-490-040(8) (2/19/91) Conveyorized Degreasers	It does not apply to any of the emission units at the facility.			
WAC 173-490-040(9) (2/19/91) Cutback Asphalt Paving	The facility does not engage in the activity subject to requirements of this subsection.			
WAC 173-490-040(10) (2/19/91) Cold Cleaners	It does not apply to any of the emission units at the facility.			
WAC 173-490-080 (2/19/91) Exceptions and Alternative Methods	Subsection (1) not applicable because facility has not applied for an alternative emission reduction method. Subsection (2) The facility does not have a gas-fired incinerator used to comply with the requirements of this chapter.			
WAC 173-490-201 (2/19/91) Petroleum Liquid Storage In External Floating Roof Tanks	The facility does not have any petroleum liquid storage tanks.			
WAC 173-490-205 (2/19/91) Surface Coating of Miscellaneous Metal Parts and Products	The facility does not engage in the surface coating of metal parts or products.			

#### SECTION VI: ABBREVIATIONS

avg average

BACT best available control technology

BTU British thermal unit

CEM continuous emission monitor

CO carbon monoxide
DOE Department of Ecology
dscf dry standard cubic foot

EPA Environmental Protection Agency

FCAA Federal Clean Air Act gpm gallons per minute

gt&c general terms and conditions

g/m<sup>3</sup> grams per cubic meter

gr grain

HAP hazardous air pollutant IEU insignificant emission unit

kg kilogram lbs pounds

MACT maximum available control technology

μg/m³ micrograms per cubic meter MMBTU million British thermal units

NOx nitrogen oxides

NSPS new source performance standards

PM particulate matter

PM<sub>10</sub> particulate matter less than 10 microns in diameter

POM polycyclic organic matter

ppm parts per million

ppmdv part per million dry volume

PSD prevention of significant deterioration

RCW Revised Code of Washington

RACT reasonable available control technology

SERP source emission reduction plan SIP state implementation plan

SO<sub>2</sub> sulfur dioxide tpy tons per year U.S.C. United States Code

VOC volatile organic compound

VE visible emissions

WAC Washington Administrative Code